

**BRYAN, CAVE, McPHEETERS & McROBERTS**

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

29 QUEEN ANNE'S GATE  
LONDON SW1H 9BU  
01-222-0511  
TELEX: 264001 BCMM G

POST OFFICE BOX 20883  
RIYADH, SAUDI ARABIA  
465-1371  
TELEX: 203093 INTLAW SJ

POST OFFICE BOX 2105  
AL KHOBAR, SAUDI ARABIA  
894-3000

ROBERT F. VAN VOORHEES

1015 FIFTEENTH STREET, N.W.  
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TELEX: 4312030 BCMM STL

3100 CROCKER CENTER  
333 SOUTH GRAND AVENUE  
LOS ANGELES, CALIFORNIA 90071-3171  
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350 PARK AVENUE  
NEW YORK, NEW YORK 10022-6022  
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July 10, 1987

US EPA RECORDS CENTER REGION 5



1000308

Bruce Carlson  
Staff Attorney  
Enforcement Programs  
Division of Land Pollution Control  
Illinois Environmental Protection Agency  
220 Churchill Road  
Springfield, IL 62706

Dear Bruce:

As promised, we are enclosing a revised RCRA Part A application for Chemetco. The application deletes all units previously listed on Chemetco's 1985 Part A application, with the exception of the zinc oxide storage pile that is contained within the concrete "zinc oxide bunker." Given the period during which this material has been stored, Chemetco has concluded that interim status must be retained to allow for speculative accumulation of this otherwise unregulated recyclable material.

We are also enclosing a memorandum that explains the status of each other item that has been deleted from either the 1980 or 1985 RCRA Part A application. As we discussed, this memorandum explains the grounds on which Chemetco has concluded that these other units are not subject to RCRA requirements, including closure requirements.

I trust that this submission will provide an adequate basis for our further discussions about the site investigation plan. Please call me if you have any questions.

Sincerely,

Robert F. Van Voorhees

/lh  
cc: Roger Grimes, Esq.

		<b>U.S. ENVIRONMENTAL PROTECTION AGENCY</b> <b>GENERAL INFORMATION</b> Consolidated Permit Program (Read the "General Instructions" before starting.)	<b>EPA I.D. NUMBER</b> <div style="border: 1px solid black; padding: 2px;">         F I L D 0 4 8 8 4 3 8 0 9       </div>
<b>I. LABEL ITEM</b> <div style="border: 1px solid black; padding: 5px;"> <b>I. EPA I.D. NUMBER</b>          ILD048843809   <b>II. FACILITY NAME</b>          CHEMETCO, INC.  <b>FACILITY MAILING ADDRESS</b>          HIGHWAY 3 AND OLDENBERG ROAD          HARTFORD, IL 62048   <b>III. FACILITY LOCATION</b>          HIGHWAY 3 AND OLDENBERG ROAD          HARTFORD, IL 62048       </div>		<b>GENERAL INSTRUCTIONS</b> If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate III—in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper III—in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.	

## II. POLLUTANT CHARACTERISTICS

**INSTRUCTIONS:** Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK "X"			SPECIFIC QUESTIONS	MARK "X"		
	YES	NO	FORM ATTACHED		YES	NO	FORM ATTACHED
<b>A.</b> Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		<b>B.</b> Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
<b>C.</b> Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)	X			<b>D.</b> Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
<b>E.</b> Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)		X	X	<b>F.</b> Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
<b>G.</b> Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		<b>H.</b> Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
<b>I.</b> Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		<b>J.</b> Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

## III. NAME OF FACILITY

1	SKIP	CHEMETCO, INC.
---	------	----------------

## IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title)	B. PHONE (area code & no.)
2 CHANG, CHENG - PING	6 1 8 2 5 4 4 3 8 1

## V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX	B. CITY OR TOWN	C. STATE	D. ZIP CODE
3 P O BOX 187	4 ALTON	IL	6 2 0 0 2

## VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER	B. COUNTY NAME
5 ROUTE 3 & OLDENBERG ROAD	MADISON

C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE (if known)
6 HARTFORD	IL	6 2 0 4 8	1 1 9

CONTINUED FROM THE FRONT

M. SIC CODES (4-digit, in order of priority)

A. FIRST		B. SECOND	
3	341	7	
Secondary Copper Smelter			
C. THIRD		D. FOURTH	

III. OPERATOR INFORMATION

A. NAME		B. Is the name listed in Item VIII-A also the owner?	
CHEMETCO, INC.		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box. If "Other", specify.)		D. PHONE (area code & no.)	
F - FEDERAL S - STATE P - PRIVATE M - PUBLIC (other than federal or state) O - OTHER (specify)		618 254 4381	
E. STREET OR P.O. BOX			
P.O. BOX 187			
F. CITY OR TOWN		G. STATE	H. ZIP CODE
ALTON		IL	62002
		IX. INDIAN LAND	
		Is the facility located on Indian lands?	
		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	

L. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)		D. PSD (Air Emissions from Proposed Sources)	
L 0025747		P	
B. UIC (Underground Injection of Fluids)		E. OTHER (specify)	
U		SEE ATTACHED SHEET	
C. RCRA (Hazardous Wastes)		E. OTHER (specify)	
R			

K. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

KII. NATURE OF BUSINESS (provide a brief description)

Secondary Copper Smelter

KIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
Thomas G. McRaven, Treasurer		7-10-87

COMMENTS FOR OFFICIAL USE ONLY

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OTHER EXISTING ILLINOIS ENVIRONMENTAL PERMITS

1. Construction Permit No. 81060046 for the fourth rotary converter.
2. Operating Permit No. 8207005 for air pollution control equipment.
3. Operating Permit No. 86040033 for baghouses.

<b>FORM 1</b> <b>RCRA</b>	 <b>EPA</b>	<b>U.S. ENVIRONMENTAL PROTECTION AGENCY</b> <b>HAZARDOUS WASTE PERMIT APPLICATION</b> Consolidated Permit Program <small>(This information is required under Section 3005 of RCRA.)</small>	<b>EPA I.D. NUMBER</b> <div style="border: 1px solid black; padding: 2px; display: inline-block;">             F I L D 0 4 8 8 4 3 8 0 9           </div>						
<b>FOR OFFICIAL USE ONLY</b>									
APPLICATION APPROVED <div style="border: 1px solid black; width: 100px; height: 20px; margin-top: 5px;"></div>	DATE RECEIVED (yr., mo., & day) <div style="border: 1px solid black; width: 100px; height: 20px; margin-top: 5px;"></div>	COMMENTS <div style="border: 1px solid black; width: 100%; height: 40px; margin-top: 5px;"></div>							
<b>II. FIRST OR REVISED APPLICATION</b>									
Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.									
<b>A. FIRST APPLICATION</b> (place an "X" below and provide the appropriate date) <input type="checkbox"/> 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.) <div style="display: flex; align-items: center; margin-top: 5px;"> <div style="border: 1px solid black; padding: 2px; margin-right: 5px;">C</div> <div style="border: 1px solid black; padding: 2px; margin-right: 5px;">VR</div> <div style="border: 1px solid black; padding: 2px; margin-right: 5px;">MO</div> <div style="border: 1px solid black; padding: 2px;">DAY</div> </div> FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)		<input type="checkbox"/> 2. NEW FACILITY (Complete item below.) FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN <div style="display: flex; align-items: center; margin-top: 5px;"> <div style="border: 1px solid black; padding: 2px; margin-right: 5px;">VR</div> <div style="border: 1px solid black; padding: 2px; margin-right: 5px;">MO</div> <div style="border: 1px solid black; padding: 2px;">DAY</div> </div>							
<b>B. REVISED APPLICATION</b> (place an "X" below and complete item I above) <input checked="" type="checkbox"/> 1. FACILITY HAS INTERIM STATUS		<input type="checkbox"/> 2. FACILITY HAS A RCRA PERMIT							
<b>III. PROCESSES - CODES AND DESIGN CAPACITIES</b>									
<b>A. PROCESS CODE</b> - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).									
<b>B. PROCESS DESIGN CAPACITY</b> - For each code entered in column A enter the capacity of the process.									
1. AMOUNT - Enter the amount. 2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.									
PROCESS	PRO-CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PRO-CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY				
<b>Storage:</b>			<b>Treatment:</b>						
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS	TANK	T01	GALLONS PER DAY OR LITERS PER DAY				
TANK	S02	GALLONS OR LITERS	SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY				
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS	INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR				
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS	OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)	T04	GALLONS PER DAY OR LITERS PER DAY				
<b>Disposal:</b>									
INJECTION WELL	D79	GALLONS OR LITERS							
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER							
LAND APPLICATION	D81	ACRES OR HECTARES							
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY							
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS							
UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE				
GALLONS	B	LITERS PER DAY	V	ACRE-FEET	A				
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F				
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B				
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	G				
GALLONS PER DAY	M	LITERS PER HOUR	N						
<b>DUP</b>									
LINE NUMBER	A. PRO-CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY	LINE NUMBER	A. PRO-CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT	2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S 0 2	600	G		5				
X-2	T 0 3	20	E		6				
1	S 0 3	80,000			7				
2					8				
3					9				
4					10				

# I. PROCESSES (continued)

SPACE FOR ADDITIONAL PROCESS CODES OR DESCRIBING OTHER PROCESSES (code "T04") FOR EACH PROCESS ENTERED HERE  
INCLUDE DESIGN CAPACITY.

## IV. DESCRIPTION OF HAZARDOUS WASTES

**1. EPA HAZARDOUS WASTE NUMBER** - Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

**2. ESTIMATED ANNUAL QUANTITY** - For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

**3. UNIT OF MEASURE** - For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS.....	P	KILOGRAMS.....	K
TONS.....	T	METRIC TONS.....	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

## D. PROCESSES

### 1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous waste: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous waste that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

**2. PROCESS DESCRIPTION:** If a code is not listed for a process that will be used, describe the process in the space provided on the form.

**NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER** - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

**EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below)** - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO. X-1 X-2 X-3 X-4	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K054	900	P	T03D80	
X-2	D002	400	P	T03D80	
X-3	D001	100	P	T03D80	
X-4	D002				Included with above

EPA I.D. NUMBER (enter from page 2)										FOR OFFICIAL USE ONLY									
W I L D 0 4 8 8 4 3 8 0 9										DUP 2 DUP									
IV. DESCRIPTION OF HAZARDOUS WASTES (continued)																			
LINE NO.	A. EPA HAZARD WASTE NO. (enter code)			B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES								PROCESS DESCRIPTION (enter code & not entered in D(1))					
	1	2	3			1. PROCESS CODES (enter)													
1				SEE ATTACHED PAGE	BA														
2																			
3																			
4																			
5																			
6																			
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26																			

**IV. DESCRIPTION OF HAZARDOUS WASTE (continued)****E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.**

EPA I.D. NO. (enter from page 1)														
F	I	L	D	0	4	8	8	4	3	8	0	9	VIA	C
												6		

**V. FACILITY DRAWING**

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

**VI. PHOTOGRAPHS**

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures, existing storage, treatment and disposal areas, and sites of future storage, treatment or disposal areas (see instructions for more detail).

**VII. FACILITY GEOGRAPHIC LOCATION**

LATITUDE (degrees, minutes, & seconds)												LONGITUDE (degrees, minutes, & seconds)											
3 8 4 7 0 3 0												0 9 0 0 5 0 0 0											

**VIII. FACILITY OWNER**

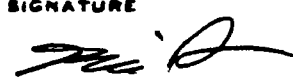
☐ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

☐ B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER												2. PHONE NO. (area code & no.)											
E																							
3. STREET OR P.O. BOX												4. CITY OR TOWN											
F												G											
5. ST.												6. ZIP CODE											


**IX. OWNER CERTIFICATION**

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
Thomas G. McRaven, Treasurer		7-10-87

**X. OPERATOR CERTIFICATION**

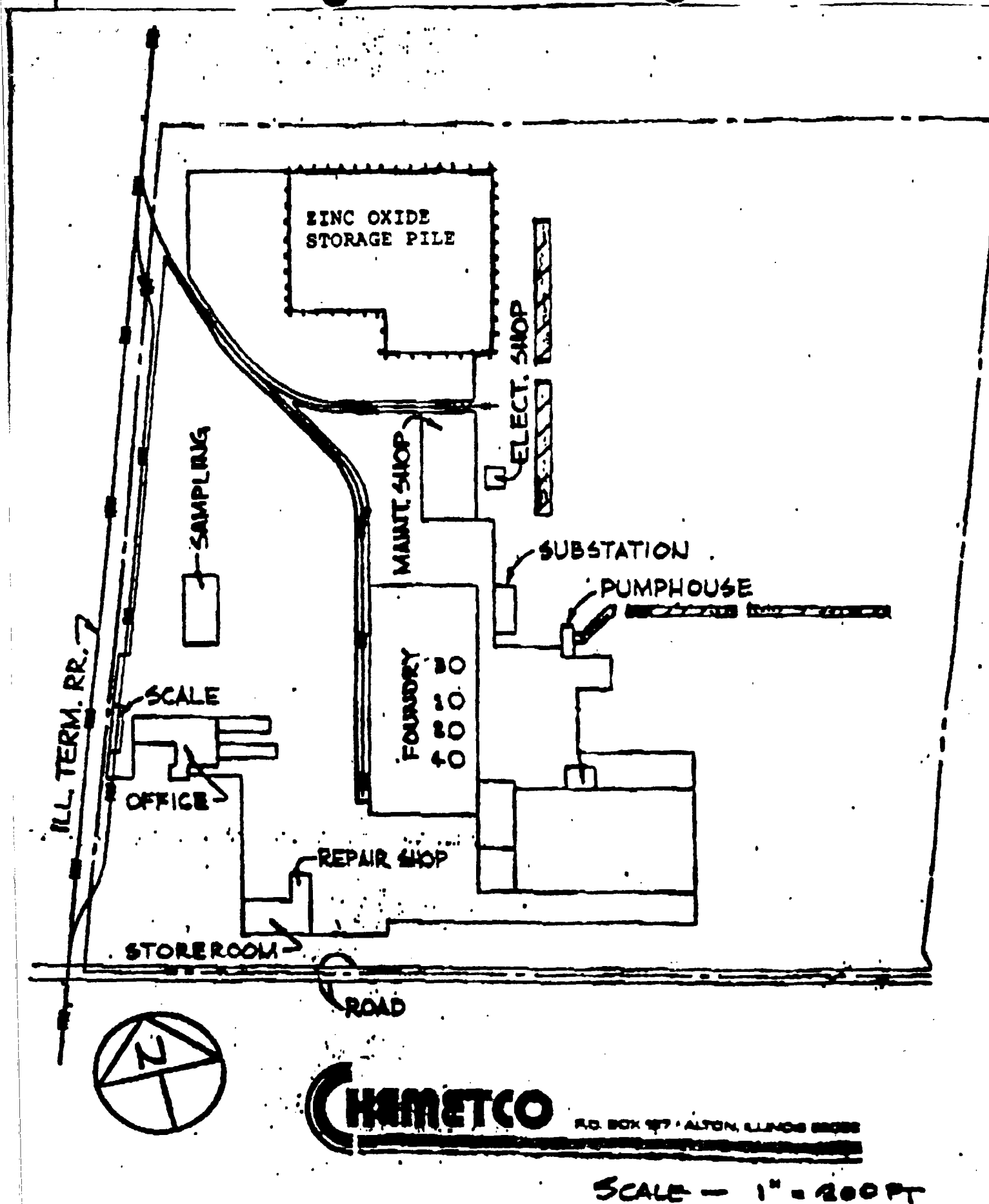
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
Thomas G. McRaven, Treasurer		7-10-87



#### IV. Description of Hazardous Wastes

Chemetco is filing this Part A application to allow storage in a concrete-lined storage pile of recyclable zinc oxide material when it is accumulated speculatively. The material stored in the pile will be a RCRA regulated material when it is accumulated speculatively if it has a characteristic of EP toxicity, but the zinc oxide material is not a hazardous waste per se. The zinc oxide is being stored for sale and reclamation, not for treatment or disposal as a hazardous waste.



REVISED PART A RCRA APPLICATION FOR  
CHEMETCO, INC. (ILD 048843809)

Submitted to the Illinois Environmental  
Protection Agency July 10, 1987

I. INTRODUCTION

Chemetco submits this 1987 revised RCRA Part A application as promised in conjunction with ongoing discussions between Chemetco, Inc., and the Illinois Environmental Protection Agency (IEPA) for resolving RCRA (Resource Conservation and Recovery Act) concerns, including the pending enforcement action filed on behalf of IEPA before the Illinois Pollution Control Board. IEPA v. Chemetco, Inc., PCB 84-178 (filed Dec. 4, 1984). As the following discussion will show, only one of the units listed on Chemetco's previous Part A applications may be subject to regulation as a RCRA storage unit.

Chemetco filed its original RCRA Part A application on November 7, 1980, for a permit to operate a hazardous waste management facility engaged in the storage of hazardous wastes at its Hartford, Illinois plant. Chemetco filed its revised RCRA Part A application on November 8, 1985. In its 1985 revised Part A application Chemetco deleted several units that had been listed unnecessarily on its 1980 original Part A application out of an abundance of caution, but which were not

in fact subject to RCRA regulation. Chemetco listed on its 1985 revised Part A application several units that were entirely prospective and that were never even constructed. As it had done in 1980, Chemetco also listed unnecessarily on its 1985 revised Part A application several units that were not and are not now subject to RCRA regulation. Once again, the listings were protective in nature and based on the belief that the units should be listed to allow Chemetco flexibility to handle materials it thought potentially might be subject to RCRA regulation.

Following a careful reevaluation of its operations under the applicable hazardous waste regulations, Chemetco has decided to revise its largely protective and prospective 1985 Part A application in order to reflect accurately current operations at its Hartford plant. Chemetco has concluded that only one unit on its premises, the zinc oxide storage pile, should be listed on the 1987 revised Part A application it is now submitting and that the remainder of the units listed on Chemetco's previous Part A applications should be deleted. This memorandum discusses the reasons for the revisions reflected in Chemetco's 1987 Part A application and explains why the deleted units listed on the previous Part A applications need not be "closed" pursuant to 35 Ill. Adm. Code §§725.210 et seq.

## II. CHEMETCO'S 1987 REVISED RCRA PART A APPLICATION

The accompanying 1987 revised Part A application (Exhibit "A") lists Chemetco's zinc oxide storage pile, also referred to as the zinc oxide storage bunker, with process code S03, indicating a storage pile, and a design capacity of approximately 80,000 cubic yards. Prior to construction of the containment bunker, the storage pile itself was included in the listing on Line 1 of Part III of Chemetco's original Part A application filed November 7, 1980 (Exhibit "B"), where it comprised approximately 30 percent of the total capacity shown for the listing,<sup>\*/</sup> and on Line 4 of Part III of the revised Part A application filed November 8, 1985 (Exhibit "C").

The storage pile has RCRA interim status and is covered by Chemetco's pending RCRA Part B application filed November 8, 1985. If IEPA would prefer, however, Chemetco will submit a revised Part B application that includes only the zinc oxide storage pile.

Although Chemetco's previous Part A applications have listed the zinc oxide storage pile as a surface impoundment, this characterization of the storage pile was mistaken. The zinc oxide storage pile is not a depression, excavation or

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<sup>\*/</sup> The remaining 70 percent of the capacity listed on Line 1 of the 1980 RCRA Part A application consisted of zinc oxide settling pits that are addressed in Part III.A. of this memorandum, at pp. 7-10 below.

diked area designed to hold liquid wastes or wastes containing free liquids, such as a pit, pond or lagoon. Hence the zinc oxide storage pile does not fall within the definition of "surface impoundment" provided in 40 C.F.R. § 260.10 and 35 Ill. Adm. Code § 720.110. Instead, the zinc oxide storage pile consists of a "noncontainerized accumulation of solid, nonflowing" material and is the type of unit defined as a "pile" in § 260.10 and § 720.110. Examination of aerial photographs of the site confirms that the zinc oxide storage pile was indeed a pile, not an impoundment.

The zinc oxide storage pile, which is located at the north end of the Chemetco facility (see map at Exhibit "D"), is used to store the solid material produced by the double quencher Venturi wet scrubber system that captures exhaust gas from the top-blown rotary converters used by Chemetco in its secondary copper smelting operations. In this process a zinc oxide material is washed from the exhaust gas with a water spray. The zinc oxide slurry thus produced is then dewatered as part of the zinc oxide recycling process described further below. Dewatered zinc oxide material produced in the past is stored in the zinc oxide storage pile pending recycling. Chemetco's current production of zinc oxide material, however, is shipped offsite for recycling without being stored in the storage pile.

Chemetco has listed the storage pile on its 1987 revised Part A application because it appears that the zinc

oxide material stored in the storage pile may be considered a RCRA regulated material by reason of speculative accumulation. Accumulation of the zinc oxide material occurred because a depressed world market for zinc had severely limited opportunities for sale of the material. At the present time, however, there are significantly better opportunities to market the zinc oxide material and Chemetco is confident that increased sales will substantially reduce the amount of accumulated zinc oxide material. Chemetco's own recycling efforts may further reduce the inventory of zinc oxide material in its storage pile. As a result of the enhanced likelihood of recycling greater amounts of the zinc oxide material, Chemetco believes that it will qualify for a variance from classification of the zinc oxide material as a solid waste under 40 C.F.R. §§ 260.30 & 260.31 and 35 Ill. Adm. Code §§ 720.130 & 720.131, and therefore intends to submit a formal request for such a variance.

Increased opportunities for recycling the zinc oxide material should enable Chemetco to complete its plans to phase out the zinc oxide storage pile. Chemetco is not presently adding any additional zinc oxide material to the pile and expects to eliminate use of the pile except for short-term storage prior to recycling. For the time being, however, Chemetco has taken significant precautions to prevent material loss and environmental contamination prior to the time when all of the accumulated zinc oxide material is recycled.

Chemetco's zinc oxide storage pile has a complete containment system for the zinc oxide material. An 8-inch reinforced concrete slab resting on the soil at ground level now underlies the zinc oxide pile. The slab is surrounded by a reinforced concrete containment wall. The containment wall is surrounded by a curbed secondary collection system. Chemetco has installed precipitation runoff and run-on control systems for the slag pile. Covering and periodic wetting of the zinc oxide material serve to reduce wind loss of the material.

The concrete containment structure for the zinc oxide pile was constructed in 1984 -- the last concrete was poured on October 29, 1984. The structure was built on the same site previously occupied by the zinc oxide pile. Briefly, the construction involved removing the zinc oxide material and any contaminated underlying soil from the storage area to permit pouring the concrete slab and containment walls, and then replacing the zinc oxide material and soil on the slab after construction was completed. The soil underlying the zinc oxide storage pile was sampled and analyzed to eliminate any residual soil contamination.

The construction process for the containment bunker, including sampling and analysis procedures and results, is fully described in the "Zinc Oxide Storage Pile Closure Documentation Report" previously submitted to IEPA for the purpose of providing data and information relevant to the ongoing settlement discussions in the pending enforcement



proceeding. Because the zinc oxide storage pile has not been closed, the report is cited only to demonstrate that Chemetco followed appropriate procedures to eliminate any residual contamination underlying the concrete structure containing the zinc oxide storage pile.

III. STATUS OF UNITS DELETED FROM CHEMETCO'S  
1980 ORIGINAL PART A APPLICATION

This section addresses the 1980 original Part A application, discusses each unit listed on that application and explains the reasons for deleting all but one of the units listed therein from subsequent Part A applications. The one unit listed on the 1987 revised Part A application is the zinc oxide storage pile discussed in Part II above.

A. Zinc Oxide Settling Pits

The 1980 original Part A application combined in one listing two separate units: the zinc oxide settling pits and the zinc oxide storage pile discussed above. These units are listed on Line 1 of Part III of the original RCRA Part A application with the process code S04, indicating a storage surface impoundment. As noted above, the zinc oxide storage pile was incorrectly characterized as a surface impoundment and included in this listing, where it comprised 30 percent of the listed capacity. The remaining 70 percent of the listed

capacity consisted of earthen impoundments in existence at the time that were used as settling units in the process of recycling the zinc oxide material.

The zinc oxide settling pits were two parallel dirt-lined excavations approximately 25 feet wide, 180 feet long and 15 feet deep that were located directly to the east of the foundry. These pits were used as settling units for the slurry produced by the wet scrubber system that is used to wash zinc oxide material from the exhaust gas emitted by the rotary converters. The pits were used to allow the zinc oxide material to settle out of the scrubber slurry. After separation of the slurry in the pits, the liquid was returned to the scrubber circuit to collect more solid material. The settled solids were removed from the pits using a clam-shell bucket and were either sold for recycling or taken to the zinc oxide storage pile.

These zinc oxide settling pits were used by Chemetco for recycling the zinc oxide material. The zinc oxide pits were an essential part of the zinc oxide recycling process because settling that occurred in them facilitated the recovery of metal values and was necessary to material recovery. See 50 Fed. Reg. 614, 639 (Jan. 4, 1985). Dewatering of a sludge prior to further recycling is recognized as part of the recycling process. *see footnote - not when material is stored in SI* *Dewatering is reclamation. sludge is not returned to the orig. process* Id.; 48 Fed. Reg. 14472, 14487 (Apr. 4, 1983). The zinc oxide settling pits were not used for any other treatment, storage or disposal purpose. The zinc oxide

pits were therefore not RCRA regulated units because the recycling process is exempt from regulation. See 40 C.F.R. § 261.6(c)(1); 35 Ill. Adm. Code § 721.106(c)(1); 50 Fed. Reg. 33541, 33542 (Aug. 20, 1985).

*Storage prior to recycling is regulate*  
Even though the zinc oxide settling pits were exempt from regulation, Chemetco nevertheless took special precautions to ensure against residual contamination from their operation. On January 4, 1985, Chemetco began the removal of all residual zinc oxide material and contaminated soil from the pits. This task was completed on February 8, 1985, and is described fully in the "Zinc Oxide Pits Closure Documentation Report" at Tab IV of Chemetco's Comprehensive Proposal for Resolving RCRA Concerns, which was submitted to IEPA October 27, 1986, in order to facilitate settlement of the pending enforcement proceeding and other outstanding RCRA concerns raised by IEPA.

Cleaning of the zinc oxide settling pits was accomplished by excavating the zinc oxide material and inner surface of soil from the pits and hauling the removed material to the zinc oxide storage pile. In order to eliminate residual soil contamination, the soil remaining in the area occupied by the zinc oxide pits was sampled and analyzed. Details and results of the sampling and analysis are included in the closure documentation report. If the soil samples exceeded the EP toxicity level for lead or cadmium further excavation was conducted until sampling and analysis demonstrated that the remaining soil did not exceed the EP toxicity levels for lead

or cadmium. When soil sampling and analysis results proved satisfactory for all portions of the excavated pits, the area was filled.

B. Pot Slag Storage Pile

At the time Chemetco filed its 1980 original Part A application it had on its premises a storage area used for temporary storage of a material referred to as "pot slag." This unit was listed on Line 2 of Part III of the original Part A application with the process code S03, indicating a storage waste pile. The pot slag storage pile was located to the northeast of the foundry. Pot slag is a by-product of Chemetco's secondary smelting operation that is formed in the process of pouring molten metal from the rotary converters into steel pots. The pot slag has metallurgical characteristics different from the other slag by-product ordinarily produced in Chemetco's secondary smelting operation. Pot slag that had cooled and hardened was stored temporarily on the pot slag storage pile before being fed back into the rotary converters for further metal reclamation. The pot slag inventory was constantly being turned over by reintroduction into the rotary converters. The listed pot slag storage pile is no longer in operation. Pot slag contained in the storage pile was completely recycled by returning it to the rotary converters. Because the pot slag consisted of solidified chunks, Chemetco encountered no problems in completely cleaning up the area once occupied by the listed pot slag storage pile.

The pot slag storage pile was not a RCRA regulated unit. Because the pot slag was always returned to the rotary converters, it was never discarded and thus it could not have been a waste material within the definition of solid waste in the 1980 RCRA regulations. 40 C.F.R. § 261.2 (May 19, 1980). The same result is reached under current regulations. Even assuming that the pot slag exhibited a characteristic of hazardous waste it would not be a solid waste since characteristic by-products are not solid waste when reclaimed. See 40 C.F.R. § 261.2(c)(3) and Table 1; 35 Ill. Adm. Code § 721.102(c)(3) and Appendix Z. The pot slag also would be excluded from classification as solid waste because it was returned directly to the process from which it was generated. See 40 C.F.R. § 261.2(e)(1)(iii); 35 Ill. Adm. Code § 721.102(e)(1)(C). Because the pot slag was not a solid waste it could not have been a hazardous waste. See 40 C.F.R. § 261.3(a); 35 Ill. Adm. Code § 721.103(a).

The pot slag storage pile thus was not used to handle material classified as solid or hazardous waste under the 1980 or subsequent RCRA regulations. The pot slag pile was therefore incorrectly listed on the 1980 original Part A application and has not been a regulated unit at any time thereafter. Moreover, under regulations in effect during the time the pot slag pile existed, the pot slag was not subject to regulation because it was being held for recycling or reclamation. 40 C.F.R. §261.6(a)(2) (May 19, 1980).

C. Black Acid Storage Tank

A material referred to as "black acid" was stored in the tank listed on Line 3 of Part III of the 1980 original Part A application with the process code S02, indicating a storage tank. The tank was located directly south of the tank house building to the southeast of the foundry. The black acid, which consisted primarily of sulfuric acid, was produced by processing a solution resulting from electrolysis operations.

The black acid stored in this listed tank following processing was used beneficially as a product without further processing. For example, some of the black acid was sold for use directly in the pickling process of iron and steel manufacturing. Under the applicable RCRA regulations, the black acid was a product and not a waste material within the definition of solid waste. 40 C.F.R. § 261.2 (May 19, 1980). In any event, the black acid was not subject to regulation because it was being used beneficially or stored for beneficial use. 40 C.F.R. §261.6(a) (May 19, 1980). The black acid tank was therefore not a RCRA regulated unit and need not have been listed on Chemetco's 1980 original Part A application. The listed storage tank is no longer used to store black acid and is now empty.

D. Drums of Trichloroethylene

Chemetco listed two drums containing unused trichloroethylene, a solvent, on Line 4 of Part III of the 1980 original Part A application with the process code S01, indicating a storage container. The trichloroethylene was

being stored at that time for current use as a solvent degreaser in Chemetco's normal maintenance operations. The material was purchased specifically for this purpose. The trichloroethylene was not a hazardous waste because it was not discarded, or intended to be discarded, or used or handled in any other manner that would cause it to fall within the definition of hazardous waste. See 40 C.F.R. §§ 261.2, 261.3, 261.33; 35 Ill. Adm. Code §§ 721.102, 721.103, 721.133. Accordingly, the drums were not regulated storage units and it was not necessary to list them on the 1980 original Part A application. The drums were listed on the original Part A application only because Chemetco had been advised mistakenly that the solvent remaining in an opened drum and held for later use constituted a waste.

The drums of trichloroethylene are no longer on Chemetco's premises. The trichloroethylene was used as a solvent for degreasing piping, valves, meters and fittings in Chemetco's oxygen lines. Because the substance evaporates quickly, it was completely consumed in the process of being used for degreasing. As a consequence, no solid or hazardous waste resulted from the storage and use of the trichloroethylene. After the trichloroethylene in the drums had been used the drums contained no residue because of the rapid evaporation of the material. Even if a minute amount of the material had remained in the drums it would not have been subject to regulation. 40 C.F.R. §261.7; 35 Ill. Adm. Code §721.107.

#### E. Summary

The preceeding discussion demonstrates that the zinc oxide storage pile is the only unit listed on Chemetco's 1980 original Part A application that may now be a unit subject to RCRA regulation. All of the remaining units have been taken out of operation. Although these units were unregulated, and thus not required to undergo formal RCRA closure, Chemetco made special protective efforts to eliminate any residual environmental contamination resulting from operation of these units.

The focus of these protective efforts has been the former zinc oxide settling pits. Despite the fact that the zinc oxide pits did not require formal RCRA closure, since they were recycling process units, Chemetco has taken those steps to eliminate contamination described in the report previously submitted to IEPA by Chemetco for the purpose of advancing settlement of the pending enforcement proceeding. Chemetco also has proposed to consider the zinc oxide settling pits in the site investigation plan to ensure that no residual contamination of soil or groundwater exists as a result of operating the zinc oxide pits.

#### IV. CHEMETCO'S 1985 REVISED PART A APPLICATION

In this section Chemetco will discuss each of the nine units that were listed on its revised Part A application submitted November 8, 1985. As the following discussion



demonstrates, the zinc oxide storage pile, listed on Chemetco's 1987 revised Part A application, is the only one of these nine listed units that may be a RCRA regulated unit. It was therefore not necessary to list the remaining units on the 1985 Part A application, and Chemetco need not comply with closure requirements for these other units.

A. Tote Boxes

Chemetco unnecessarily listed prospective tote boxes on Line 1 of Part III of the 1985 revised Part A application with process code S01, indicating a storage container. This listing comprises tote boxes of a particular kind that would have been used for material handling had Chemetco implemented prospective plans that had been developed for handling RCRA regulated material. These tote boxes were never purchased or put into operation and thus need not have been listed on Chemetco's 1985 or 1987 revised Part A applications.

B. Proposed Tankage in the Cooling Water Canal

At the time Chemetco filed its 1985 revised Part A application it planned to convert a portion of its cooling water canal into concrete-lined tankage for use in collecting storm water runoff and possibly for use as a process unit. This prospective unit was listed on Line 2 of Part III of the 1985 revised Part A application with process code S02, indicating a storage tank.

This listing on the 1985 revised Part A application did not refer to the cooling water canal itself, which was never used or intended for use in handling hazardous waste and was therefore not a RCRA regulated unit. The planned conversion of the canal to concrete-lined tankage was not undertaken, and the listed proposed unit never existed. It was therefore unnecessary to list the proposed unit on Chemetco's 1985 or 1987 revised Part A applications. The former cooling water canal has now been taken out of operation and cleaned. Chemetco no longer plans to convert any part of it for use in handling RCRA regulated materials.

C. Proposed Storage Pile

As a protective measure Chemetco listed a proposed storage pile on Line 3 of Part III of the 1985 revised Part A application with process code S03, indicating a storage pile. This proposed storage pile was intended to be used for temporary storage of material prior to its recycling in the rotary converters, i.e., as a staging area. The proposed storage pile was to have been located east of the foundry. However, the pile was never created and never existed. It was therefore unnecessary to list the proposed pile on the 1985 or 1987 revised Part A applications.

D. Zinc Oxide Storage Pile

Chemetco's zinc oxide storage pile was listed on Line 4 of Part III of the 1985 revised Part A application. This unit is now listed on Chemetco's 1987 revised Part A application.

E. Tanks

Proposed and existing tanks were prospectively listed on Line 5 of Part III of the 1985 revised Part A application with process code T01, indicating treatment tanks. This listing includes a proposed "tank farm" consisting of a number of tanks that would have been located to the northeast of the foundry. The tank farm was proposed for use in treating material potentially subject to RCRA regulation. This listing also included other tanks existing at the time of the application that were listed prospectively so that they could be used in conjunction with and for the same purpose as the tanks in the proposed tank farm. However, Chemetco did not construct or operate any part of the proposed tank farm, nor did it place any of the other listed tanks into service for the purpose for which they had been listed together with the proposed tank farm. Because the tank farm and related tanks were listed entirely prospectively, they need not have been listed on Chemetco's 1985 or 1987 revised Part A applications and need not be closed.

F. Concrete-Lined Zinc Oxide Settling Pit

Chemetco currently uses a dual-compartment concrete-lined pit, located east of the foundry, for recycling the zinc oxide material that is contained in the slurry produced by the wet scrubber system. This settling pit, also referred to as the "Polish pit," is used to settle the solids out of the slurry to facilitate recycling of the zinc oxide material. The

zinc oxide slurry initially enters the north compartment of the pit. Gravity causes the liquid to move into the south compartment of the pit, thus concentrating the zinc oxide material in the north compartment. The concrete-lined zinc oxide settling pit was listed on Line 6 of Part III of the 1985 revised Part A application with process code T02, indicating a treatment surface impoundment.

Following settling and dewatering in the concrete-lined zinc oxide settling pit, the zinc oxide material is dewatered further in a plate filter press and shipped offsite for additional recycling. Chemetco's current production of zinc oxide material is sold for reclamation and for direct use to produce products (e.g., zinc sulfate). Chemetco ships approximately 100 to 120 tons of the zinc oxide material offsite for recycling per week. The settling pit itself is not, and has not been, used for storage of the zinc oxide material -- only for recycling the material. The zinc oxide material is removed from the north compartment of the pit two times per week and from the south compartment once per week.

Chemetco listed the concrete-lined zinc oxide settling pit on its 1985 revised Part A application prospectively and out of an abundance of caution. At that time Chemetco thought that the settling pit would possibly be used in the future to handle RCRA regulated material and that if the pit were used for this purpose it would perhaps be subject to RCRA regulation. As discussed below, Chemetco's basis for listing

the concrete-lined zinc oxide settling pit as a regulated hazardous waste management unit was mistaken. Thus, it was unnecessary to list the pit on the 1985 revised Part A application and it need not have been listed on Chemetco's 1987 revised Part A application.

The first reason the concrete-lined zinc oxide settling pit is not a regulated hazardous waste management unit is that it has not been used for handling hazardous waste. The zinc oxide material is either a sludge or by-product of Chemetco's secondary copper smelting operations. See 40 C.F.R. §§ 260.10, 261.1(c)(2)&(3); 35 Ill. Adm. Code §§ 721.110, 721.101(c)(2)&(3). The recycling of the zinc oxide material by recyclers may be characterized as either reclamation or direct use to make a product. See 40 C.F.R. § 261.1(c)(4)&(5); 35 Ill. Adm. Code § 721.101(c)(4)&(5). All previous recycling of the zinc oxide material from the settling pits was similarly reclamation or use to make a product. Even if the zinc oxide material exhibits a characteristic of hazardous waste it is not a solid waste because sludges and by-products that exhibit a characteristic of hazardous waste are not solid wastes when they are reclaimed. 40 C.F.R. § 261.2(c)(3) and Table 1; 35 Ill. Adm. Code § 721.102(c)(3) and Appendix Z. Nor are such materials solid wastes when they are used as ingredients to make a product. 40 C.F.R. § 261.2(e)(1)(i); 35 Ill. Adm. Code § 721.102(e)(1)(A). Because the zinc oxide material is not a solid waste it is not a hazardous waste. 40 C.F.R. § 261.3(a);

35 Ill. Adm. Code § 721.103(a). Since the concrete-lined zinc oxide settling pit has not been and is not used to handle hazardous waste, it is not a regulated hazardous waste management unit.

The concrete-lined zinc oxide settling pit is also unregulated for a second, separate reason. As explained above, the concrete-lined zinc oxide settling pit is the starting point, and thus an integral part, of the process of recycling the zinc oxide material. Dewatering of a material prior to further recycling is recognized as part of the recycling process. See 50 Fed. Reg. 614, 639 (Jan. 4, 1985); 48 Fed. Reg. 14472, 14487 (Apr. 4, 1983). The settling that occurs in the zinc oxide settling pit facilitates the recovery of metal values, is necessary to material recovery, and therefore constitutes recycling. See 50 Fed. Reg. 614, 639 (Jan 4, 1985). Because the recycling process is exempt from regulation, the zinc oxide settling pit is not a regulated hazardous waste management unit. See 40 C.F.R. § 261.6(c)(1); 35 Ill. Adm. Code § 721.106(c)(1); 50 Fed. Reg. 33541, 33542 (Aug. 20, 1985).

#### G. Zinc Oxide Dewatering Equipment

In addition to the zinc oxide settling pits, Chemetco has used several types of mechanical equipment to dewater the zinc oxide slurry produced by the wet scrubbers. This

dewatering equipment has included at different times a centrifuge, a belt filter and a plate filter press. These devices are included in the listing on Line 7 of Part III of the 1985 revised Part A application with a process code T04, indicating a treatment unit.

The centrifuge was located immediately to the southeast of the pump house. Chemetco has not used a centrifuge in the time period from 1980 to the present. When the centrifuge was taken out of operation it was cleaned and sold. Zinc oxide material in the area of centrifuge operation was cleaned up and either sold or taken to the zinc oxide storage pile.

The belt filter, also called the belt press, was located to the east of the north compartment of the concrete-lined zinc oxide settling pit. The belt filter was used only on an experimental basis. It was leased by Chemetco, is no longer used and was removed from the site. When the belt filter was taken out of operation it was scraped and washed on a concrete pad and sent back to its owner. The concrete pad was then cleaned up.

Chemetco uses a plate filter press for dewatering the zinc oxide material in its current zinc oxide recycling operations. The plate filter press is located in the tank house to the southeast of the foundry.

These dewatering devices are and were used only in the process of recycling the zinc oxide material and not for any

other treatment or storage purpose. They were not regulated hazardous waste management units, see 40 C.F.R. § 261.6(c)(1); 35 Ill. Adm. Code § 721.106(c)(1); 50 Fed. Reg. 33541, 33542 (Aug. 20, 1985), and need not have been listed on Chemetco's 1985 revised Part A application or on its 1987 revised Part A application.

#### H. Proposed Evaporators and Solidifier

At the time Chemetco submitted its 1985 revised Part A application it had developed plans to install evaporators near the proposed tank farm described above to be used for removing moisture in the prospective operation of the tank farm. The proposed evaporators were listed on Line 8 of Part III of the 1985 revised Part A application with process code T04, indicating a treatment unit. These evaporators were entirely prospective and were never constructed or installed.

Chemetco also was considering at the time it submitted its 1985 revised Part A application plans to install a solidifier as part of a proposed process to treat materials potentially subject to RCRA regulation. The solidifier would have been located in a proposed building to the east of the foundry. The proposed solidifier was listed on Line 9 of Part III of the 1985 revised Part A application with process code T04, indicating a treatment unit. The listing was entirely prospective and the solidifier was never constructed or installed.



Because they were never in operation, the evaporators and solidifier therefore need not have been listed on the 1985 or 1987 revised Part A applications.

I. Summary

As on the 1980 original Part A application, the zinc oxide storage pile is the only unit listed on the 1985 revised Part A application that may now be a RCRA regulated unit. That unit is listed on Chemetco's 1987 revised Part A application. Several of the listings on the 1985 revised Part A application were entirely prospective and were listed according to plans that were never put into operation: the tote boxes, the concrete-lined tankage planned for the site of the cooling water canal, the proposed storage pile, the proposed tank farm and related tanks, the proposed evaporators and the proposed solidifier. None of the units used for recycling the zinc oxide material, encompassing the concrete-lined zinc oxide settling pit and the mechanical dewatering equipment, were regulated units because the recycling process is exempt from regulation.

V. SUMMARY OF STATUS FOR UNITS LISTED  
ON CHEMETCO's RCRA PART A APPLICATIONS

A. Chemetco's 1980 Original Part A Application

<u>Line</u>	<u>Code</u>	<u>Unit</u>	<u>Status</u>
1	S04	Zinc oxide storage pile	May be subject to RCRA regulation at present time: possible speculative accumulation.
		Zinc oxide settling pits	Not regulated: exempt from regula- tion as a recycling process unit.
2	S03	Pot slag storage pile	Not regulated: material was not a hazardous waste; material was held for recycling.
3	S02	Black acid storage tank	Not regulated: material was a product and thus not a hazardous waste; material was used beneficially or held for beneficial use.
4	S01	Drums of trichloro- ethylene	Not regulated: material was not a hazardous waste; empty containers exempt from regulation.

B. Chemetco's 1985 Revised Part A Application

<u>Line</u>	<u>Code</u>	<u>Unit</u>	<u>Status</u>
1	S01	Tote boxes	Prospectively listed: never existed.
2	S02	Proposed tankage in cooling water canal	Prospectively listed: never constructed or placed in operation.
3	S03	Proposed storage pile	Prospectively listed: never existed.

<u>Line</u>	<u>Code</u>	<u>Unit</u>	<u>Status</u>
4	S04	Zinc oxide storage pile	May be subject to RCRA regulation at present time: possible speculative accumulation.
5	T01	Proposed tank farm and related tanks	Prospectively listed: most tanks were never constructed; none of the tanks was ever placed in operation.
6	T02	Concrete-lined zinc oxide settling pit	Not regulated: not used for hazardous waste; exempt from regulation as a recycling process unit.
7	T04	Zinc oxide dewatering equipment	Not regulated: exempt from regulation as a recycling process unit.
8	T04	Proposed evaporators	Prospectively listed: never constructed or installed.
9	T04	Proposed solidifier	Prospectively listed: never constructed or installed.

Respectfully submitted,

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Counsel for Chemetco, Inc.

U.S. ENVIRONMENTAL PROTECTION AGENCY GENERAL INFORMATION (Read the "General Instructions" before starting.)		EPA I.D. NUMBER
<b>I. GENERAL INFORMATION</b> <b>II. FACILITY NAME</b> <b>III. FACILITY ADDRESS</b> <b>IV. FACILITY LOCATION</b>		<b>EPA I.D. NUMBER</b> ILD048843809
<b>II. POLLUTANT CHARACTERISTICS</b> <b>INSTRUCTIONS:</b> Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.		<b>GENERAL INSTRUCTIONS</b> If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate III-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper III-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

SPECIFIC QUESTIONS	MARK 'X'			SPECIFIC QUESTIONS	MARK 'X'		
	YES	NO	FORM ATTACHED		YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)	X			D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)		X	X	F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may effect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may effect or be located in an attainment area? (FORM 5)		X	

**III. NAME OF FACILITY**  
 1. SKIP CHEMETCO, INC.

**IV. FACILITY CONTACT**

A. NAME & TITLE (last, first, & title)		B. PHONE (area code & no.)			
2	CHANG, CHENG - PING	6	18	254	4381

**V. FACILITY MAILING ADDRESS**

A. STREET OR P.O. BOX		B. CITY OR TOWN		C. STATE	D. ZIP CODE
3	P O BOX 187	4	ALTON	IL	62002

**VI. FACILITY LOCATION**

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER		B. COUNTY NAME		C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE (if known)
5	ROUTE 3 & OLDENBERG ROAD		MADISON	HARTFORD	IL	62048	119

IV. SIC CODES (4-digit, in order of priority)

A. FIRST		B. SECOND	
3	3	4	1
(specify)		(specify)	
Secondary Copper Smelter			
C. THIRD		D. FOURTH	
(specify)		(specify)	

V. OPERATOR INFORMATION

A. NAME		B. Is the name listed in Item VIII-A also the owner?	
CHEMETCO, INC.		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)		D. PHONE (area code & no.)	
F - FEDERAL S - STATE P - PRIVATE M - PUBLIC (other than federal or state) O - OTHER (specify)		618 254 4381	

E. STREET OR P.O. BOX		F. CITY OR TOWN		G. STATE		H. ZIP CODE		IX. INDIAN LAND	
PO BOX 187		ALTON		IL		62002		Is the facility located on Indian lands?	
								<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)		D. PSD (Air Emissions from Proposed Sources)	
L 00 25747			
E. UIC (Underground Injection of Fluids)		F. OTHER (specify)	
U		SEE ATTACHED SHEET	
C. RCRA (Hazardous Wastes)		G. OTHER (specify)	
R			

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

Secondary Copper Smelter

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
Thomas G. McRaven, Treasurer		7-10-87

COMMENTS FOR OFFICIAL USE ONLY

--

OTHER EXISTING ILLINOIS ENVIRONMENTAL PERMITS

1. Construction Permit No. 81060046 for the fourth rotary converter.
2. Operating Permit No. 8207005 for air pollution control equipment.
3. Operating Permit No. 86040033 for baghouses.

**FOR OFFICIAL USE ONLY**

**COMMENTE**

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in item 1 above.

☐ 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day)  
OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED  
(see the boxes to the left)

YR.		MO.		DAY	
72	74	72	73	77	78

FOR NEW FACILITIES  
PROVIDE THE DATE  
(yr., mo., & day), OPERA  
TION BEGAN OR IS  
EXPECTED TO BEGIN

**B. REVISED APPLICATION** (place an "X" below and complete Item I above)

☒ 1. FACILITY HAS INTERIM STATUS

☐ 2. FACILITY HAS A RCRA PERMIT

### III. PROCESSES - CODES AND DESIGN CAPACITIES

A. **PROCESS CODE** - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

**2. PROCESS DESIGN CAPACITY** - For each code entered in column A enter the capacity of the process.

1. AMOUNT - Enter the amount.

2. **UNIT OF MEASURE** – For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
<b>Storage:</b>			<b>Treatment:</b>		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS	TANK	T01	GALLONS PER DAY OR LITERS PER DAY
TANK	S02	GALLONS OR LITERS	SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS	INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS			
<b>Disposal:</b>			<b>OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)</b>		
INJECTION WELL	D79	GALLONS OR LITERS		T04	GALLONS PER DAY OR LITERS PER DAY
LANDFILL	D80	ACRE-Feet (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER			
LAND APPLICATION	D81	ACRES OR HECTARES			
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY			
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS			
UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	L	ACRE-Feet	A
LITERS	L	TONS PER HOUR	T	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	M	ACRES	S
CUBIC METERS	C	GALLONS PER HOUR	H	HECTARES	G
GALLONS PER DAY	U	LITERS PER HOUR	N		

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

C		DUP		T/A C 1							
LINE NUMBER	A. PROCESS CODE (from list above)		B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)		B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY
			1. AMOUNT (specify)	2. UNIT OF MEASURE (enter code)					1. AMOUNT (specify)	2. UNIT OF MEASURE (enter code)	
X-1	S	02	600	G		5					
X-2	T	03	20	E		6					
1	S	03	80,000			7					
2						8					
3						9					
4						10					

**II. PROCESSES (continued)**

SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

**DESCRIPTION OF HAZARDOUS WASTES**

**EPA HAZARDOUS WASTE NUMBER** — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

**B. ESTIMATED ANNUAL QUANTITY** — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

**C. UNIT OF MEASURE** — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS.....	P	KILOGRAMS.....	K
TONS.....	T	METRIC TONS.....	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

**D. PROCESSES****1. PROCESS CODES:**

For listed hazardous wastes: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

**2. PROCESS DESCRIPTION:** If a code is not listed for a process that will be used, describe the process in the space provided on the form.

**NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER** — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

**EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below)** — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARDOUS WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K054	900	P	T03D80	
X-2	D002	400	P	T03D80	
X-3	D001	100	P	T03D80	
X-4	D002				Included with above



EPA I.D. NUMBER (enter from page 2)										FOR OFFICIAL USE OF									
W	I	L	D	0	4	8	8	4	3	8	0	9	1	W	1	2	DUP	DUP	
IV. DESCRIPTION OF HAZARDOUS WASTES (continued)																			
WASTE NO.	A. EPA HAZARD. WASTE NO. (enter code)			B. ESTIMATED ANNUAL QUANTITY OF WASTE			C. UNIT OF MEASURE (enter code)	D. PROCESSES											
								1. PROCESS CODES (enter)					2. PROCESS DESCRIPTION (if a code is not entered in D(1))						
1				SEE ATTACHED PAGE 3A															
2																			
3																			
4																			
5																			
6																			
7																			
8																			
9																			
10																			
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24																			
25																			
26																			

**V. DESCRIPTION OF HAZARDOUS WASTES (continued)****E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.**

EPA I.D. NO. (enter from page 1)

F	I	L	D	0	4	8	8	4	3	8	0	9	6
1	2	3	4	5	6	7	8	9	10	11	12	13	14

**VI. FACILITY DRAWING**

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

**VI. PHOTOGRAPHS**

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

**VII. FACILITY GEOGRAPHIC LOCATION**

LATITUDE (degrees, minutes, &amp; seconds)

LONGITUDE (degrees, minutes, &amp; seconds)

3	8	4	7	0	3	0
55	55	57	55	58	58	59

0	9	0	0	5	0	0	0
72	72	73	73	74	74	75	75

**VIII. FACILITY OWNER**
☐ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

☐ B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code &amp; no.)

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

**IX. OWNER CERTIFICATION**

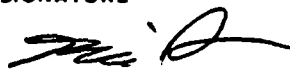
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED

Thomas G. McRaven, Treasurer



7-10-87

**X. OPERATOR CERTIFICATION**

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED

Thomas G. McRaven, Treasurer

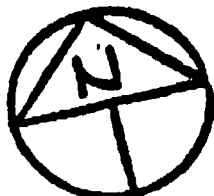
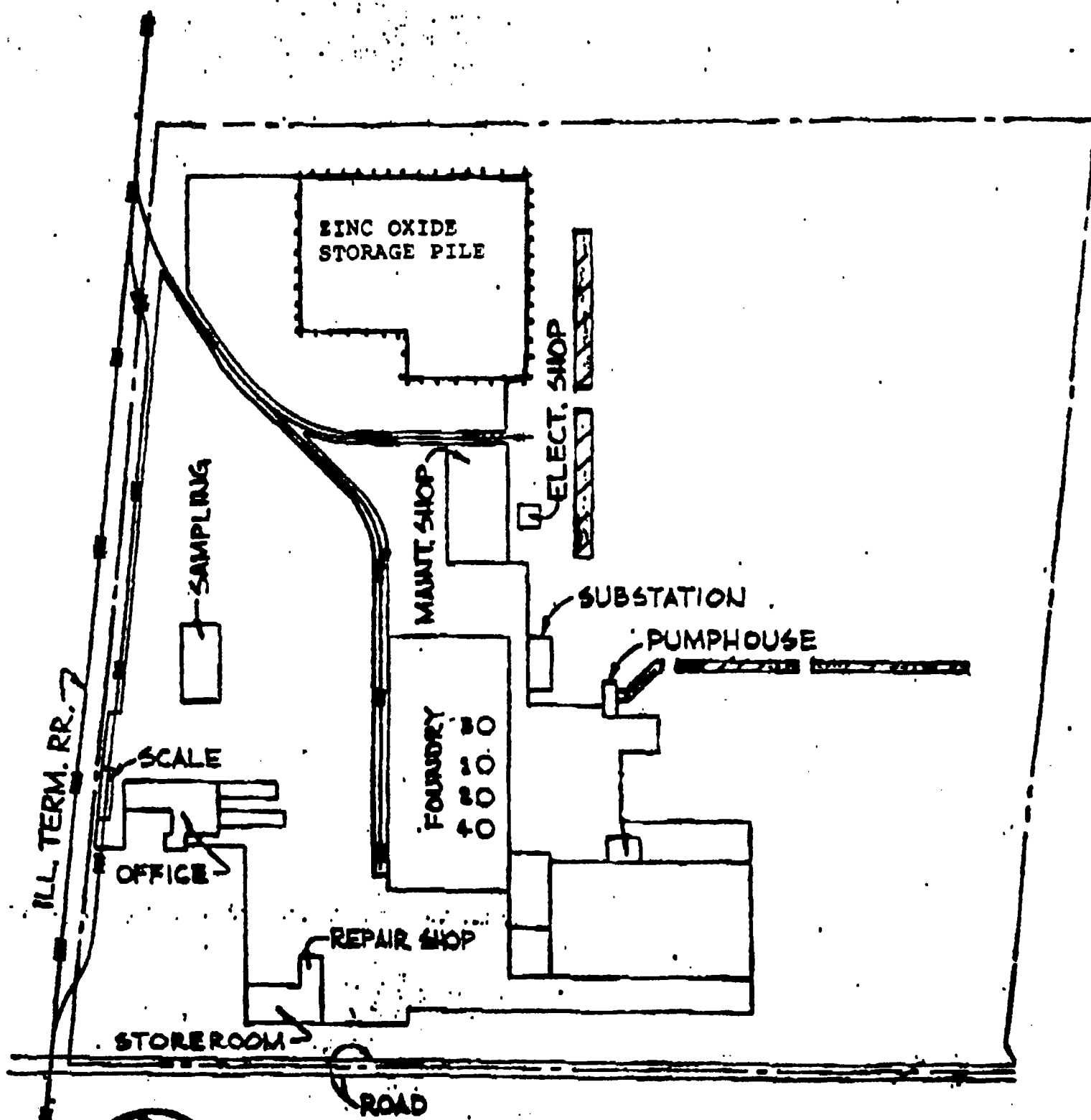


7-10-87

#### IV. Description of Hazardous Wastes

Chemetco is filing this Part A application to allow storage in a concrete-lined storage pile of recyclable zinc oxide material when it is accumulated speculatively. The material stored in the pile will be a RCRA regulated material when it is accumulated speculatively if it has a characteristic of EP toxicity, but the zinc oxide material is not a hazardous waste per se. The zinc oxide is being stored for sale and reclamation, not for treatment or disposal as a hazardous waste.

V. FACILITY DRAWING (see page 4)



**CHMETCO**

P.O. BOX 177 - ALTON, ILLINOIS 62002

SCALE - 1" = 200 FT

U.S. ENVIRONMENTAL PROTECTION AGENCY		NOTIFICATION OF HAZARDOUS WASTE ACTIVITY	EPA I.D. NUMBER
<b>EPA</b>		<b>F I L D 0 4 8 8 4 3 8 0 9</b>	
<b>GENERAL INSTRUCTIONS</b>			
<p>If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.</p>			
I. EPA	INSTALLATION'S EPA I.D. NO.	11DD48843809	
III. FA	NAME OF INSTALLATION	CHEMETCO INC	
V. FAC MA	INSTALLATION MAILING ADDRESS	HWY 3 & OLDENBURG RD HARTFORD, IL 62048	
VI. FA LO	LOCATION OF INSTALLATION	HWY 3 & OLDENBURG RD HARTFORD, IL 62048	

## II. POLLUTANT CHARACTERISTICS

**INSTRUCTIONS:** Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK "X"			SPECIFIC QUESTIONS	MARK "X"		
	YES	NO	FORM ATTACHED		YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)	X			D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X			F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

## III. NAME OF FACILITY

SKIP	CHEMETCO INC
------	--------------

## IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title)		B. PHONE (area code & no.)	
2 SUAREZ, JOHN	VP & GEN. MGR	618	254 4381

## V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX		B. CITY OR TOWN		C. STATE	D. ZIP CODE
3 P.O. BOX 187		ALTON		IL	62002

## VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER		B. COUNTY NAME		C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE (if known)
ROUTE 3 & OLDENBURG ROAD		JOHNSON		HARTFORD	IL	62048	UNK

SIC CODES (4-digit, in order of priority)

A. FIRST		B. SECOND	
3 4 1 (specify)	COPPER	7 3 3 1 3 (specify)	COPPER
C. THIRD		D. FOURTH	
3 3 1 (specify)	COPPER	7 3 3 3 9 (specify)	COPPER

OPERATOR INFORMATION

A. NAME		B. Is the name listed in Item VIII-A also the owner?
SUAREZ JOHN		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box: If "Other", specify.)		D. PHONE (area code & no.)	
FEDERAL STATE PRIVATE	M = PUBLIC (other than federal or state) O = OTHER (specify) P (specify) N/A	6 1 8	2 5 4 4 3 1

E. STREET OR P.O. BOX
BOX 187

F. CITY OR TOWN	G. STATE	H. ZIP CODE	IX. INDIAN LAND
ELTON	IL	6 2 0 0 2	Is the facility located on Indian lands? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)	D. PSD (Air Emissions from Proposed Sources)
IL 0025747	9 P N A
B. UIC (Underground Injection of Fluids)	E. OTHER (specify)
N A	1 1 9 8 0 1 A A C (specify) ILL EPA PLANT OPERATING PERMIT
C. RCRA (Hazardous Wastes)	E. OTHER (specify)
	1 1 9 8 0 1 A A C (specify) ILL EPA FURNACE OPERATING PERMIT

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

NATURE OF BUSINESS (provide a brief description)

Secondary copper smelter with an electrolytic refinery for producing copper cathode

CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all documents and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
John M. Suarez, V. P.		

SPACES FOR OFFICIAL USE ONLY

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NA

## IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

D. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE
POUNDS	P
TONS	T

METRIC UNIT OF MEASURE	CODE
KILOGRAMS	K
METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

## D. PROCESSES

## 1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

W O JZ	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEA- SURE (enter code)	D. PROCESSES							
				1. PROCESS CODES (enter)				2. PROCESS DESCRIPTION (if a code is not entered in D(1))			
X-1	K 0 5 4	900	P	T	0	3	D	8	0		
X-2	D 0 0 2	400	P	T	0	3	D	8	0		
X-3	D 0 0 1	100	P	T	0	3	D	8	0		
X-4	D 0 0 2									included with above	



EPA I.D. NUMBER (enter from page 1)												FOR OFFICIAL USE ONLY											
I L D 0 4 8 8 4 3 8 0 9 <div style="float: right; text-align: right;">T/A C 1</div>												W <div style="float: right; text-align: right;">T/A C 2 DUP</div>											

V. DESCRIPTION OF HAZARDOUS WASTES (continued)

WASTE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES															
				1. PROCESS CODES (enter)								2. PROCESS DESCRIPTION (if a code is not entered in D(1))							
				27	28	29	30	31	32	33	34	35	36	37	38	39	40		
1	F 0 0 2	50	G	S	0	1													
2	F 0 0 7	7300000	L	S	0	2													
3	F 0 0 8	56100	G	S	0	1													
4	U 0 4 3	50	G	S	0	1													
5	U 2 1 9	50	G	S	0	1													
6	U 2 2 6	50	G	S	0	1													
7	K 0 6 9	822	T	S	0	4													
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N/A

EPA I.D. NO. (enter from page 1)  
 0048843809

**FACILITY DRAWING**

existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

**PHOTOGRAPHS**

existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas, and sites of future storage, treatment or disposal areas (see instructions for more detail).

**FACILITY GEOGRAPHIC LOCATION**

LATITUDE (degrees, minutes, & seconds)

38 47 03 0

LONGITUDE (degrees, minutes, & seconds)

09 00 50 00 0

**FACILITY OWNER**

A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER		2. PHONE NO. (area code & no.)	
CHEMETCO		618-254-4381	
3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
P. O. Box 187	ALTON	IL	62002

**OWNER CERTIFICATION**

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
John M. Suarez	John M. Suarez	11-17-80

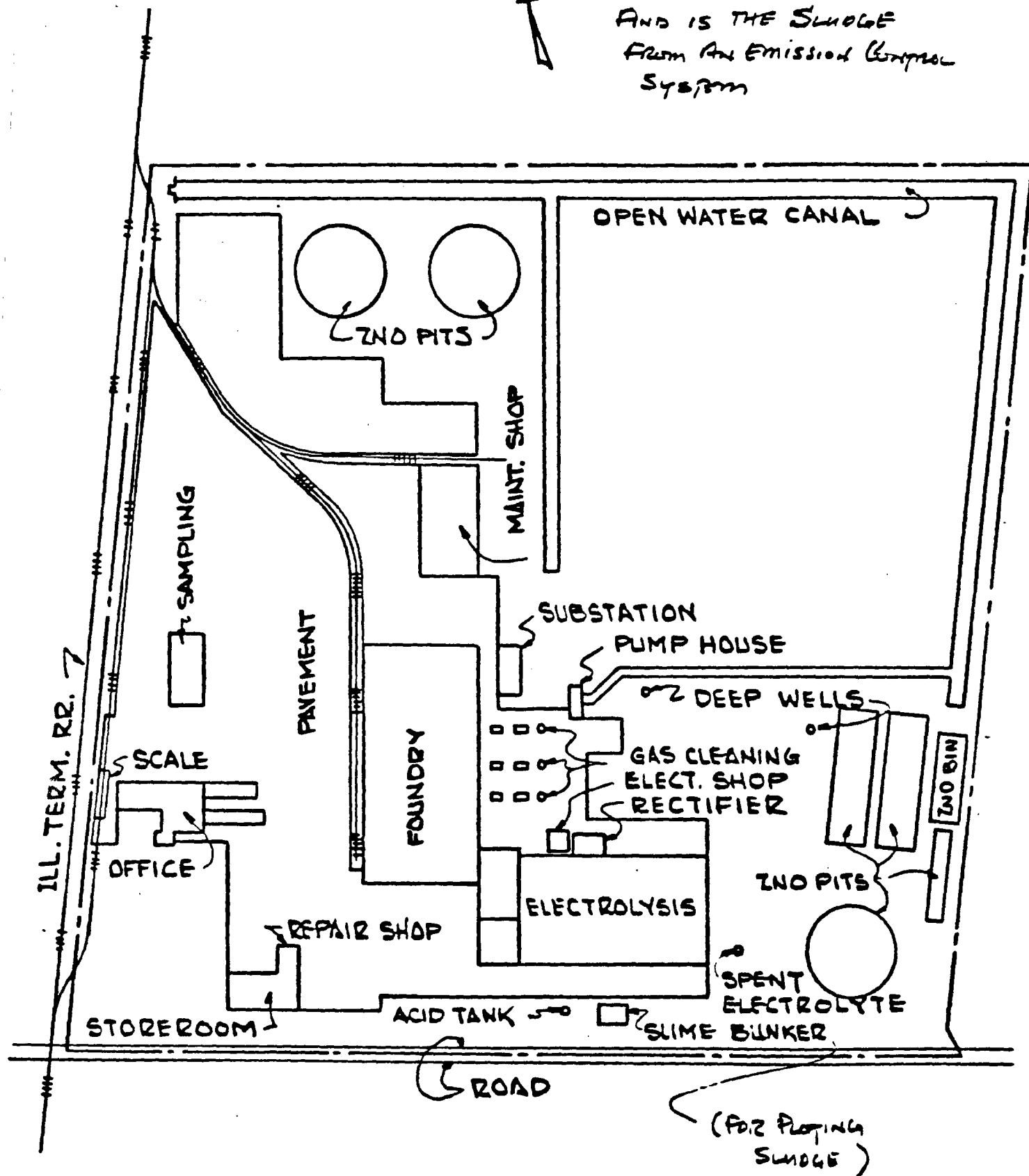
**OPERATOR CERTIFICATION**

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
John M. Suarez	John M. Suarez	11-17-80

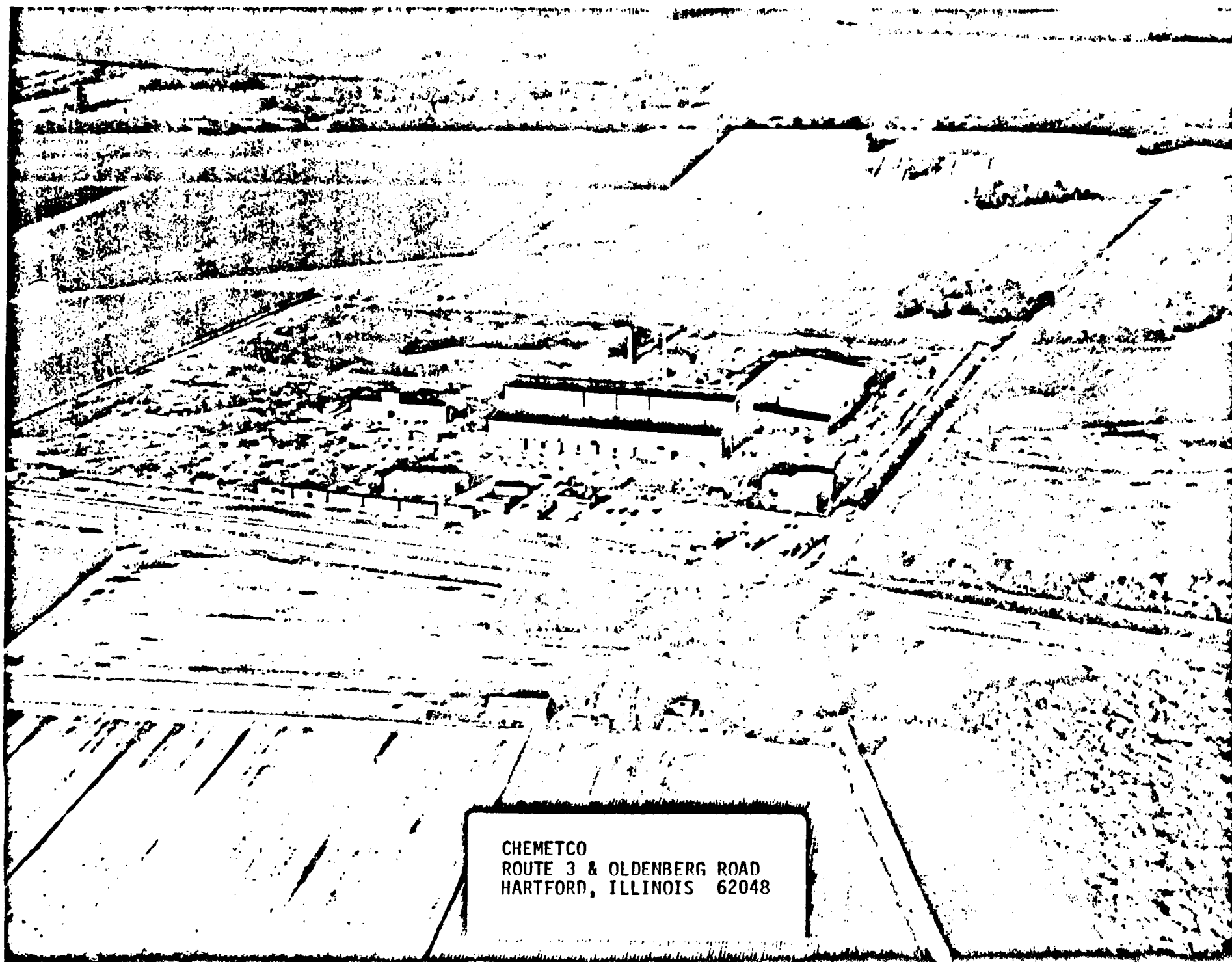
NOTE:

"ZND" IS IN BRUE FORM  
AND IS THE SLUDGE  
FROM AN EMISSION CONTROL  
SYSTEM



PRESENT SITE PLAN  
SCALE - 1" = 200'

PAGE 5 OF 5



CHEMETCO  
ROUTE 3 & OLDENBERG ROAD  
HARTFORD, ILLINOIS 62048

FORM 1 GENERAL		U.S. ENVIRONMENTAL PROTECTION AGENCY <b>GENERAL INFORMATION</b> Consolidated Permits Program (Read the "General Instructions" before starting.)		I. EPA I.D. NUMBER																																																							
		PLEASE PLACE LABEL IN THIS SPACE		<div style="border: 1px solid black; padding: 2px;">             F I L D 0 4 8 8 4 3 8 0 9           </div>																																																							
II. POLLUTANT CHARACTERISTICS				<p><b>GENERAL INSTRUCTIONS</b></p> <p>If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.</p>																																																							
<p><b>INSTRUCTIONS:</b> Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.</p>																																																											
<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th rowspan="2" style="width: 45%;">SPECIFIC QUESTIONS</th> <th colspan="3" style="text-align: center;">MARK "X"</th> <th rowspan="2" style="width: 45%;">SPECIFIC QUESTIONS</th> <th colspan="3" style="text-align: center;">MARK "X"</th> </tr> <tr> <th>YES</th> <th>NO</th> <th>FORM ATTACHED</th> <th>YES</th> <th>NO</th> <th>FORM ATTACHED</th> </tr> </thead> <tbody> <tr> <td>A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)</td> <td></td> <td>X</td> <td></td> <td>B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)</td> <td></td> <td>X</td> <td></td> </tr> <tr> <td>C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)</td> <td></td> <td>X</td> <td></td> <td>D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)</td> <td></td> <td>X</td> <td></td> </tr> <tr> <td>E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)</td> <td>X</td> <td></td> <td></td> <td>F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)</td> <td></td> <td>X</td> <td></td> </tr> <tr> <td>G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)</td> <td></td> <td>X</td> <td></td> <td>H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)</td> <td></td> <td>X</td> <td></td> </tr> <tr> <td>I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)</td> <td></td> <td></td> <td></td> <td>J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? 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III. NAME OF FACILITY																																																											
1 SKIP CHEMETCO, INC.																																																											
IV. FACILITY CONTACT																																																											
A. NAME & TITLE (last, first, & title)				B. PHONE (area code & no.)																																																							
2 McKell, Joel Plant Engineer				618 254 4381																																																							
V. FACILITY MAILING ADDRESS																																																											
A. STREET OR P.O. BOX																																																											
3 P.O. BOX 187																																																											
B. CITY OR TOWN				C. STATE D. ZIP CODE																																																							
4 ALTON				IL 62002																																																							
VI. FACILITY LOCATION																																																											
A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER																																																											
5 ROUTE 3 & OLDENBERG ROAD																																																											
B. COUNTY NAME																																																											
MADISON																																																											
C. CITY OR TOWN				D. STATE E. ZIP CODE F. COUNTY CODE (if known)																																																							
6 HARTFORD				IL 62048																																																							

CONTINUED FROM THE FRONT

## VII. SIC CODES (4-digit, in order of priority)

A. FIRST										B. SECOND													
C	7	3	1	4	4	(specify)	Secondary Copper Smelter					C	7					(specify)					
C. THIRD										D. FOURTH													
C	7					(specify)						C	7					(specify)					

## VIII. OPERATOR INFORMATION

A. NAME																														B. Is the name listed in Item VIII-A also the owner?									
C	8	C	H	E	M	E	T	C	O	,	I	N	C	.																	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO								
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)																				D. PHONE (area code & no.)																			
F = FEDERAL	M = PUBLIC (other than federal or state)																			C	A	6	1	8	2	5	4	4	3	8	1								
S = STATE	O = OTHER (specify)																			A																			
P = PRIVATE																																							
E. STREET OR P.O. BOX																																							
P. O. BOX 187																																							
F. CITY OR TOWN																				G. STATE					H. ZIP CODE					IX. INDIAN LAND									
C	B	A	L	T	O	N														I	L	6	2	0	0	2	Is the facility located on Indian lands?												
																														<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO									

## X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)										D. PSD (Air Emissions from Proposed Sources)																				
C	9	N	L	0	0	2	5	7	4	7	C	9	P																	
B. UIC (Underground Injection of Fluids)										E. OTHER (specify)																				
C	9	U								C	9									(specify)	Air Permit (Construction)									
C. RCRA (Hazardous Wastes)										E. OTHER (specify)																				
C	9	R								C	9									(specify)										

## XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

## XII. NATURE OF BUSINESS (provide a brief description)

## XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)															B. SIGNATURE															C. DATE SIGNED									
Thomas G. McRaven, Treasurer															Thomas G. McRaven															November 7, 1985									
COMMENTS FOR OFFICIAL USE ONLY																																							
C																																							

<b>FORM 1</b> <b>RCRA</b>	<b>EPA</b>	<b>U.S. ENVIRONMENTAL PROTECTION AGENCY</b> <b>HAZARDOUS WASTE PERMIT APPLICATION</b> <i>Consolidated Permits Program</i> (This information is required under Section 3006 of RCRA.)	<b>I. EPA I.D. NUMBER</b>											
			<table border="1"><tr><td>F</td><td>1</td><td>L</td><td>0</td><td>0</td><td>4</td><td>8</td><td>8</td><td>4</td><td>3</td><td>8</td><td>0</td><td>9</td><td>1</td></tr></table>	F	1	L	0	0	4	8	8	4	3	8
F	1	L	0	0	4	8	8	4	3	8	0	9	1	

<b>2. OFFICIAL USE ONLY</b>		<b>COMMENTS</b>																												
<b>LOCATION</b> APPROVED	<b>DATE RECEIVED</b> (Yr., Mo., & Day)																													
<table border="1"><tr><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr></table>															<table border="1"><tr><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr></table>															

**II. FIRST OR REVISED APPLICATION**

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

<b>A. FIRST APPLICATION</b> (place an "X" below and provide the appropriate date)		<b>B. NEW FACILITY</b> (Complete item below.)																									
<input checked="" type="checkbox"/> <b>1. EXISTING FACILITY</b> (See instructions for definition of "existing" facility. Complete item below.)	<input type="checkbox"/> <b>2. NEW FACILITY</b> (Complete item below.)	FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN																									
<table border="1"><tr><td>Yr.</td><td>Mo.</td><td>Day</td></tr><tr><td>6</td><td>9</td><td>0</td></tr><tr><td>7</td><td>9</td><td>0</td></tr><tr><td>7</td><td>9</td><td>0</td></tr></table>	Yr.	Mo.	Day	6	9	0	7	9	0	7	9	0	<table border="1"><tr><td>Yr.</td><td>Mo.</td><td>Day</td></tr><tr><td></td><td></td><td></td></tr><tr><td></td><td></td><td></td></tr><tr><td></td><td></td><td></td></tr></table>	Yr.	Mo.	Day											
Yr.	Mo.	Day																									
6	9	0																									
7	9	0																									
7	9	0																									
Yr.	Mo.	Day																									

**III. PROCESSES - CODES AND DESIGN CAPACITIES**

**A. PROCESS CODE** - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

**B. PROCESS DESIGN CAPACITY** - For each code entered in column A enter the capacity of the process.

1. AMOUNT - Enter the amount.

2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
<b>Storage:</b>			<b>Treatment:</b>		
CONTAINER (barrel, drum, etc.)	501	GALLONS OR LITERS	TANK	T01	GALLONS PER DAY OR LITERS PER DAY
TANK	502	GALLONS OR LITERS	SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
WASTE PILE	503	CUBIC YARDS OR CUBIC METERS	INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
SURFACE IMPOUNDMENT	504	GALLONS OR LITERS			
<b>Disposal:</b>					
INJECTION WELL	D79	GALLONS OR LITERS			
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER	OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided: (Item III-C.)	T04	GALLONS PER DAY OR LITERS PER DAY
LAND APPLICATION	D81	ACRES OR HECTARES			
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY			
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS			
UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	ACRE-FEET	A	
LITERS	L	TONS PER HOUR	HECTARE-METER	F	
CUBIC YARDS	Y	METRIC TONS PER HOUR	ACRES	S	
CUBIC METERS	C	GALLONS PER HOUR	HECTARES	O	
GALLONS PER DAY	U	LITERS PER HOUR			

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

<b>DUP</b>																																																																																			
<table border="1"><tr><th rowspan="2">LINE NUMBER</th><th rowspan="2">A. PROCESS CODE (from list above)</th><th colspan="2">B. PROCESS DESIGN CAPACITY</th><th rowspan="2">FOR OFFICIAL USE ONLY</th><th rowspan="2">LINE NUMBER</th><th rowspan="2">A. PROCESS CODE (from list above)</th><th colspan="2">B. PROCESS DESIGN CAPACITY</th><th rowspan="2">FOR OFFICIAL USE ONLY</th></tr><tr><th>1. AMOUNT (specify)</th><th>2. UNIT OF MEASURE (enter code)</th><th>1. AMOUNT</th><th>2. UNIT OF MEASURE (enter code)</th></tr><tr><td>X-1</td><td>S 0 2</td><td>600</td><td>G</td><td></td><td>5</td><td>T 0 1</td><td>576,000</td><td>U</td><td></td></tr><tr><td>X-2</td><td>T 0 3</td><td>20</td><td>E</td><td></td><td>6</td><td>T 0 2</td><td>576,000</td><td>U</td><td></td></tr><tr><td>1</td><td>S 0 1</td><td>2,000</td><td>Y</td><td></td><td>7</td><td>T 0 4</td><td>100</td><td>D</td><td></td></tr><tr><td></td><td>S 0 2</td><td>700,000</td><td>G</td><td></td><td>8</td><td>T 0 4</td><td>20,000</td><td>U</td><td></td></tr><tr><td>3</td><td>S 0 3</td><td>1,000</td><td>Y</td><td></td><td>9</td><td>T 0 4</td><td>100</td><td>D</td><td></td></tr><tr><td>4</td><td>S 0 4</td><td>3,000,000</td><td>G</td><td></td><td>10</td><td></td><td></td><td></td><td></td></tr></table>										LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY	1. AMOUNT (specify)	2. UNIT OF MEASURE (enter code)	1. AMOUNT	2. UNIT OF MEASURE (enter code)	X-1	S 0 2	600	G		5	T 0 1	576,000	U		X-2	T 0 3	20	E		6	T 0 2	576,000	U		1	S 0 1	2,000	Y		7	T 0 4	100	D			S 0 2	700,000	G		8	T 0 4	20,000	U		3	S 0 3	1,000	Y		9	T 0 4	100	D		4	S 0 4	3,000,000	G		10				
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3	S 0 3	1,000	Y		9	T 0 4	100	D																																																																											
4	S 0 4	3,000,000	G		10																																																																														

**III. PROCESSES (continued)**

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

**OTHER PROCESSES**

Line # 7 - T04 - Belt Filter, Plate filter, Centrifuge

Line # 8 - T04 - Evaporators

Line # 9 - T04 - Solidifier

**IV. DESCRIPTION OF HAZARDOUS WASTES**

**A. EPA HAZARDOUS WASTE NUMBER** — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

**B. ESTIMATED ANNUAL QUANTITY** — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

**C. UNIT OF MEASURE** — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE      CODE  
POUNDS ..... P  
TONS ..... T

METRIC UNIT OF MEASURE      CODE  
KILOGRAMS ..... K  
METRIC TONS ..... M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

**D. PROCESSES****1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

**2. PROCESS DESCRIPTION:** If a code is not listed for a process that will be used, describe the process in the space provided on the form.

**NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER** — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

**EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below)** — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEA- SURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (If a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above



EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY											
W I L D 0 4 8 8 4 3 8 0 9 1													W DUP 2 DUP											
V. DESCRIPTION OF HAZARDOUS WASTES (continued)																								
WASTE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES																				
				1. PROCESS CODES (enter)				2. PROCESS DESCRIPTION (if a code is not entered in D(1))																
1	D 0 0 6					S 0 1	S 0 3	S 0 4	T 0 4															
2	D 0 0 8													included with above										
3	D 0 1 1													included with above										
4	D 0 0 6					S 0 1	S 0 2	S 0 4	0 0 0															
5	D 0 0 8													included with above										
6	D 0 0 2					S 0 1	S 0 2	T 0 1	T 0 4															
7	D 0 0 6													included with above										
8	D 0 0 8													included with above										
9	D 0 0 4					S 0 1	S 0 3	T 0 1	T 0 2															
10	D 0 0 6													included with above										
11	D 0 0 8													included with above										
12	D 0 1 1													included with above										
13	D 0 0 1					S 0 1																		
14	F 0 0 3													included with above										
15	F 0 0 4													included with above										
16	F 0 0 5													included with above										
17	F 0 0 1					S 0 1																		
18	F 0 0 2													included with above										
19	D 0 0 6					S 0 1	S 0 2	S 0 3	0 0 0															
20	D 0 0 7													included with above										
21	D 0 0 8													included with above										
22	D 0 1 0													included with above										
23	D 0 1 1													included with above										
24																								
25																								
26																								

4. T01, T02, T04 (plate and belt presses)  
19. S04, T01, T02, T04 (plate and belt presses)

EPA I.D. NO. (enter from page 1)																
S															T/A	C
F																6
1	2												13	14		

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

All existing facilities must include photographs (*aerial or ground-level*) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (*see instructions for more detail*).

**LATITUDE (degrees, minutes, & seconds)**

[illegible]

LONGITUDE (degrees, minutes, &amp; seconds)

[illegible]

☐ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

**B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:**

1. NAME OF FACILITY'S LEGAL OWNER															2. PHONE NO. (area code & no.)																
3. STREET OR P.O. BOX															4. CITY OR TOWN										5. ST.			6. ZIP CODE			

*I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.*

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
Thomas G. McRaven	Thomas G. McRaven	NOV 7 1985

*I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.*

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
Thomas G. McRaven	Thomas G. McRaven	Nov 7 1985

EPA I.D. NUMBER (enter from page 1)												FOR OFFICIAL USE ONLY											
<div style="display: flex; justify-content: space-between;"> <span>W I L D 0 4 8 8 4 3 8 0 9</span> <span>T/A C 1</span> </div>												<div style="display: flex; justify-content: space-between;"> <span>W</span> <span>DUP</span> <span>T/A C 2</span> <span>DUP</span> </div>											

## V. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	D 0 0 2			S 0 1 S 0 2 T 0 2	
2	D 0 0 4				included with above
3	D 0 0 5				included with above
4	D 0 0 6				included with above
5	D 0 0 8				included with above
6	D 0 1 0				included with above
7	D 0 0 4			S 0 1 S 0 2 S 0 4 0 0 0	
8	D 0 0 5				included with above
9	D 0 0 6				included with above
10	D 0 0 8				included with above
11	D 0 1 0				included with above
12	D 0 1 1				included with above
13	D 0 0 2			S 0 1 S 0 2 T 0 1 T 0 4	
14	D 0 0 4				included with above
15	D 0 0 5				included with above
16	D 0 0 6				included with above
17	D 0 0 8				included with above
18	D 0 1 0				included with above
19	D 0 1 1				included with above
20	D 0 0 6			S 0 1 S 0 3 T 0 1 T 0 4	
21					
22					
23					
24					
25					
26					

7. T01, T04 (plate and belt filter presses)

## V. FACILITY DRAWING

## VI. PHOTOGRAPHS

## VII. FACILITY GEOGRAPHIC LOCATION

### VIII. FACILITY OWNER

1. NAME OF FACILITY'S LEGAL OWNER

3. STREET OR P.O. BOXIX. OWNER CERTIFICATION

**A. NAME (print or type)**

Thomas G. McRaven

Thomas G. McPaven

Nov 7 1985

### X, OPERATOR CERTIFICATION

**A. NAME** (print or type)

Thomas G. McRaven

Thomas G. Di'Arcangelo

Nov 7 1985

Continued from page 2.

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)										FOR OFFICIAL USE ONLY									
W I L D 0 4 8 8 4 3 8 0 9										W DUP 2 DUP									
V. DESCRIPTION OF HAZARDOUS WASTES (continued)										D. PROCESSES									
W Z J Z	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEA- SURE (enter code)	1. PROCESS CODES (enter)								2. PROCESS DESCRIPTION (If a code is not entered in D(1))							
				27 - 29	27 - 29	27 - 29	27 - 29	27 - 29	27 - 29	27 - 29	27 - 29								
1	D 0 0 4			S 0 1	S 0 3	T 0 1	T 0 2												
2	D 0 0 5													included with above					
3	D 0 0 6													included with above					
4	D 0 0 8													included with above					
5	D 0 1 0													included with above					
6	D 0 1 1													included with above					
7	D 0 0 4			S 0 1	S 0 2	T 0 1	T 0 4												
8	D 0 0 5													included with above					
9	D 0 0 6													included with above					
10	D 0 0 7													included with above					
11	D 0 0 8													included with above					
12	D 0 1 0													included with above					
13	D 0 1 1													included with above					
14																			
15																			
16																			
17																			
18																			
19																			
20																			
21																			
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23																			
24																			
25																			
26																			

EPA Form 3510-3 (6-80)

CONTINUE ON REVERSE

**IV. DESCRIPTION OF HAZARDOUS WASTES (continued)****E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.**

EPA I.D. NO. (enter from page 1)

F	I	L	D	0	4	8	8	4	3	8	0	9	6
---	---	---	---	---	---	---	---	---	---	---	---	---	---

**V. FACILITY DRAWING**

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

**VI. PHOTOGRAPHS**

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

**VII. FACILITY GEOGRAPHIC LOCATION**

LATITUDE (degrees, minutes, &amp; seconds)

LONGITUDE (degrees, minutes, &amp; seconds)

**VIII. FACILITY OWNER**
☐ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code &amp; no.)

C	E	CHEMETCO, INC.
---	---	----------------

6	1	8	-	2	5	4	-	4	3	8	1
---	---	---	---	---	---	---	---	---	---	---	---

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

C	F	P. O. Box 187
---	---	---------------

C	G	Alton
---	---	-------

I	L
---	---

6	2	0	0	2
---	---	---	---	---

**IX. OWNER CERTIFICATION**

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

Thomas G. McRaven

B. SIGNATURE

Thomas G. McRaven

C. DATE SIGNED

Nov 7 1985

**X. OPERATOR CERTIFICATION**

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

Thomas G. McRaven

B. SIGNATURE

Thomas G. McRaven

C. DATE SIGNED

Nov 7 1985

[illegible]

SCALE: 1 INCH = 200 FEET

## B. FACILITY DESCRIPTION

### B-1 General Description

Chemetco operates a secondary copper smelter outside of St. Louis, Missouri. This facility is near the intersection of Highways 3 and 203, north of Alton, Illinois. This smelter processes copper and tin scrap from all over the United States. Anode copper and lead/tin are poured into anodes for further processing at another facility. The smelting process generates several byproducts-slag and zinc oxide - which may require extended storage periods and/or treatment prior to sale. The slag tests out as EPA nonhazardous. The zinc oxide is EP Toxic. The zinc oxide material is produced when the smelter off gases are scrubbed with caustic liquors in venturi scrubbers. Zinc oxide material is produced. It is then dewatered, stored, and sold as-is; or is further processed on-site.

The types of industries which are serviced through the off-site facilities include but are not limited to:

- \* Electronics industries;
- \* Plating and metal finishing industry;
- \* Defense industry;
- \* Automotive industry;
- \* Hazardous waste management industry;
- \* Scrap metals industry;
- \* Chemical industry;
- \* Communications industry;
- \* Construction industry;

### B-2 Topographic Map

#### B-2a General Requirements

A set of maps are attached which include contours, floodplain, surface waters, land uses, wind rose, north, legal boundaries, access control, buildings, structures, loading and unloading areas, flood control or drainage barriers, run-off control, hazardous waste management units and solid waste management units. These maps can be found in the Appendix B-1.



## B-2b Additional Requirements

Figure B-1 shows the groundwater monitoring well locations with facility and property boundaries. The plume of contamination in the uppermost sand layer is also shown on this same map.

## B-3b Floodplain Standard

The facility is within the 100-year floodplain as indicated by the USGS map .

### B-3b(1) Demonstration of Compliance

A regional levee has been constructed which is designed to prevent floodwaters from contacting the facility. See USGS map in Appendix B-1. The facility is bounded on the west by a railroad dike which provides a secondary flood barrier.

#### B-3b(1) (a) Floodproofing and Flood Protection Measures

#### B-3b(1) (b) Floodplain

All drums stored outside will be transferred into the enclosed and raised drum storage area. This will take 2 hours to accomplish. The potential for accidental discharge is no greater than during normal operations.

All material stored in the covered waste pile will either be moved into the enclosed and raised drum storage area or will be placed on top of the zinc oxide in the impoundment area. This job will take 8 hours to accomplish using 2 front end loaders and 4 dump trucks. The potential for accidental discharge is no greater than during normal operations.

### B-3b(2) Waiver

No waiver is requested.

B-3b(3) Plan for Future Compliance

The facility is in compliance.

B-4 Traffic Information

Currently, 94% of all outside traffic entering the facility enters thru the security guarded southwest corner (truck weigh station). This traffic is due almost exclusively to scrap being delivered for reclaiming. Approximately 6 18-wheeler tractor/trailer rigs enter and leave each hour during the hours of 7 AM and 4 PM. This traffic is confined to the west and southwest side of the facility. The remaining 5% of outside traffic comes through the guarded gate outside of maintenance on the west end of south fence. This traffic is deliveries made to Shipping-Receiving.

Four front-end loaders operate continuously in the immediate area west and north of the converters. A front-end loader also operates 1-2 times per hour in moving zinc oxide sludge from the belt press east of the scrubber area to the mixing tank south of the electrolysis area. Slag is transported from the converter continuously by a special transporter designed to carry the "kettle" from the converter to the slag pile. A front-end loader operates continuously in moving the slag from the cooling area to the top of the slag pile. Forklifts operate continuously in the areas west and south of the converter. Transportation of people within the facility is done by one of two four-wheel drive "jeeps".

A third entrance in the middle of the south fence gets 1% of the traffic. This gate is for receipt of "Hazardous Manifested" loads of metal containing wastes.

All road surfacing to west, south and immediately north and east of the converters is concrete. Outlying areas are covered with Chemetco slag. The road to the slag pile is made of a high load bearing slag from a steel mill. The on-site speed limit is 15 MPH. There are no traffic signals or other control devices.

<b>FORM</b>	<b>1</b>	<b>GENERAL INFORMATION</b>	<b>U.S. ENVIRONMENTAL PROTECTION AGENCY</b> <b>NOTIFICATION OF HAZARDOUS WASTE AC.</b>	EPA I.D. NUMBER	<b>FILED 048843809</b>
<b>GENER</b>	<b>1</b>	<b>EPA</b>			
		<b>INSTALLATION'S EPA I.D. NO.</b> IL0048843809			<b>GENERAL INSTRUCTIONS</b> If a preprinted label has been provided, affix it in the designated space. Review the information carefully. If any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the appropriate fill-in areas below. If the label is incomplete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.
		<b>I. NAME OF INSTALLATION</b> CHEMETCO INC			
		<b>II. INSTALLATION MAILING ADDRESS</b> HWY 3 & OLDENBURG RD HARTFORD, IL 62048			
		<b>III. LOCATION OF INSTALLATION</b> HWY 3 & OLDENBURG RD HARTFORD, IL 62048			

II. POLLUTANT CHARACTERISTICS			
<b>INSTRUCTIONS:</b> Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parentheses following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also Section D of the instructions for definitions of bold-faced terms.			
SPECIFIC QUESTIONS	YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)	X		
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X		
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production. Inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	
B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY			
E	1	SKIP	CHEMETCO, INC.
IV. FACILITY CONTACT			
E	2	NAME & TITLE (last, first & title)	SUAREZ JOHN VP & GEN. MGR
		B. PHONE (area code & no.)	618 254 4381
V. FACILITY MAILING ADDRESS			
E	3	A. STREET OR R.D. BOX	P.O. BOX 187
		B. CITY OR TOWN	ALTON
		C. STATE	IL
		D. ZIP CODE	62002
VI. FACILITY LOCATION			
E	5	A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER	ROUTE 3 & OLDENBERG ROAD
		B. COUNTY NAME	MADISON
		C. CITY OR TOWN	HARTFORD
		D. STATE	IL
		E. ZIP CODE	62048
		F. COUNTY CODE (if known)	119

## VII. SIC CODES (4 digit, in order of priority)

A. FIRST		B. SECOND	
7 3 3 4 1 (specify)	COPPER	7 3 3 1 3 (specify)	COPPER
C. THIRD		D. FOURTH	
3 3 3 1 (specify)	COPPER	7 3 3 3 9 (specify)	COPPER

## VIII. OPERATOR INFORMATION

A. NAME		B. PHONE (area code & no.)	
SUAREZ JOHN		6 1 8 2 5 4 4 3 8 1	
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box: if "Other" specify)		D. PHONE (area code & no.)	
F = FEDERAL S = STATE P = PRIVATE M = PUBLIC (other than federal or state) O = OTHER (specify)		A 6 1 8 2 5 4 4 3 8 1	
P (specify) N/A			
E. STREET OR P.O. BOX			
P.O. BOX 187			
F. CITY OR TOWN		G. STATE H. ZIP CODE	
B A L T O N		I L 6 2 0 0 2	
		IX. INDIAN LAND	
		Is the facility located on Indian lands? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	

## X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)		C. PSD (Air Emissions from Proposed Sources)	
9 N I L 0 0 2 5 7 4 7		9 P N A	
B. UIC (Underground Injection of Fluids)		E. OTHER (specify)	
9 U N A		9 Z 1 1 9 8 0 1 A A C	(specify) ILL EPA PLANT OPERATING PERMIT
D. RCRA (Hazardous Wastes)		F. OTHER (specify)	
9 R		9 Z 1 1 9 8 0 1 A A C	(specify) ILL EPA FURNACE OPERATING PERMIT

## XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

F9: A/50

## XII. NATURE OF BUSINESS (provide a brief description)

Secondary copper smelter with an electrolytic refinery for producing copper cathode

F9: A  
51

## XIII. CERTIFICATION (see instructions)

I, the undersigned, being a duly qualified professional engineer, geologist, or other qualified person, do hereby certify that the information furnished in this application is true and correct to the best of my knowledge and belief, and that I am not aware of any false or misleading information being furnished in this application. I believe that the information is true, accurate and complete, and that there are no significant omissions or misstatements of material information, including the possibility of fraud and intentional misstatements.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
John M. Suarez, V. P.	John M. Suarez	11-17-80

## XIV. COMMENTS FOR OFFICIAL USE ONLY

--	--	--

FORM 3 RCRA		ENVIRONMENTAL PROTECTION AGENCY <b>HAZARDOUS WASTE PERMIT APPLICATION</b> Consolidated Permits Program (This information is required under Section 3005 of RCRA.)	I. EPA I.D. NUMBER											
			FIELD 04884380931											

FOR OFFICIAL USE ONLY										COMMENTS
APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)									

**II. FIRST OR REVISED APPLICATION**  
Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

<b>A. FIRST APPLICATION</b> (place an "X" below and provide the appropriate date)									
<input checked="" type="checkbox"/> 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)									
<input type="checkbox"/> 2. NEW FACILITY (Complete item below.)									
FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)									
71	72	73	74	75	76	77	78	79	80
8	6	9	0	6	0	1			

**III. PROCESSES - CODES AND DESIGN CAPACITIES**

**A. PROCESS CODE** - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

**B. PROCESS DESIGN CAPACITY** - For each code entered in column A enter the capacity of the process.  
1. AMOUNT - Enter the amount.  
2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
<b>Storage:</b>			<b>Treatment:</b>		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS	TANK	T01	GALLONS PER DAY OR LITERS PER DAY
TANK	S02	GALLONS OR LITERS	SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS	INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS			
<b>Disposal:</b>			OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)	T04	GALLONS PER DAY OR LITERS PER DAY
INJECTION WELL	D79	GALLONS OR LITERS			
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER			
LAND APPLICATION	D81	ACRES OR HECTARES			
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY			
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS			

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-FEET	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	Q
GALLONS PER DAY	U	LITERS PER HOUR	H		

**EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below):** A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

DUP										T/A C															
3										1															
13 14 15										16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32															
LINE NUMBER	A. PRO- CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY										FOR OFFICIAL USE ONLY	LINE NUMBER	A. PRO- CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY										FOR OFFICIAL USE ONLY
		1. AMOUNT (specify)					2. UNIT OF MEA- SURE (enter code)								1. AMOUNT					2. UNIT OF MEA- SURE (enter code)					
X-1	S 0 2	600					G						5												
X-2	T 0 3	20					E						6												
1	S 0 4	1271792 1271792.000					G						7												
2	S 0 3	6296000					Y						8												
3	S 0 2	20000000					G						9												
4	S 0 1	110000					G						10												

**III. PROCESSES (continued)**

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

NA**IV. DESCRIPTION OF HAZARDOUS WASTES**

**A. EPA HAZARDOUS WASTE NUMBER** — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

**B. ESTIMATED ANNUAL QUANTITY** — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

**C. UNIT OF MEASURE** — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE      CODE  
POUNDS . . . . . P  
TONS . . . . . T

METRIC UNIT OF MEASURE      CODE  
KILOGRAMS . . . . . K  
METRIC TONS . . . . . M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

**D. PROCESSES****1. PROCESS CODES:**

**For listed hazardous waste:** For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

**For non-listed hazardous wastes:** For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

**Note:** Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

**2. PROCESS DESCRIPTION:** If a code is not listed for a process that will be used, describe the process in the space provided on the form.

**NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER** — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

**EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below)** — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARDOUS WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above



EPA I.D. NO. (enter from page 1)

S												T/A	C
F	I	L	D	Ø	4	8	8	4	3	8	Ø	9	36

All **existing** facilities must include in the space provided on page 5 a scale drawing of the facility (*see instructions for more detail*).

F6: 8/55

All existing facilities must include photographs (*aerial or ground-level*) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (*see instructions for more detail*). B  
F6: 56

Storage,  $\frac{B}{F6} : \frac{B}{56}$

## LATITUDE (degrees, minutes, &amp; seconds)

3	8	4	7	3	<del>6</del>	<del>6</del>
65	66	67	68	69	-	71

**LONGITUDE** (*degrees, minutes, & seconds*)

0	9	0	0	5	0	0	0
72	-	74	75	76	77	-	79

☐ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

**B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:**

1. NAME OF FACILITY'S LEGAL OWNER															2. PHONE NO. (area code & no.)												
C	CHEMETCO														6	1	8	-	2	5	4	-	4	3	8	1	
E															59	56	-	59	-	61	62	-	65				
18	16	3. STREET OR P.O. BOX														4. CITY OR TOWN					5. ST.		6. ZIP CODE				
C	P. O. Box 187														C	ALTON					I	L	6 2 0 0 2				
F															G						A 1	A 2					
45	40	45	48	46															40	41	42						

*I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.*

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
John M. Suarez	John M. Suarez	11-17-80

*I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.*

<p><b>A. NAME (print or type)</b></p> <p>John M. Suarez</p>	<p><b>B. SIGNATURE</b></p> <p>John M. Suarez</p>	<p><b>C. DATE SIGNED</b></p> <p>11-17-80</p>
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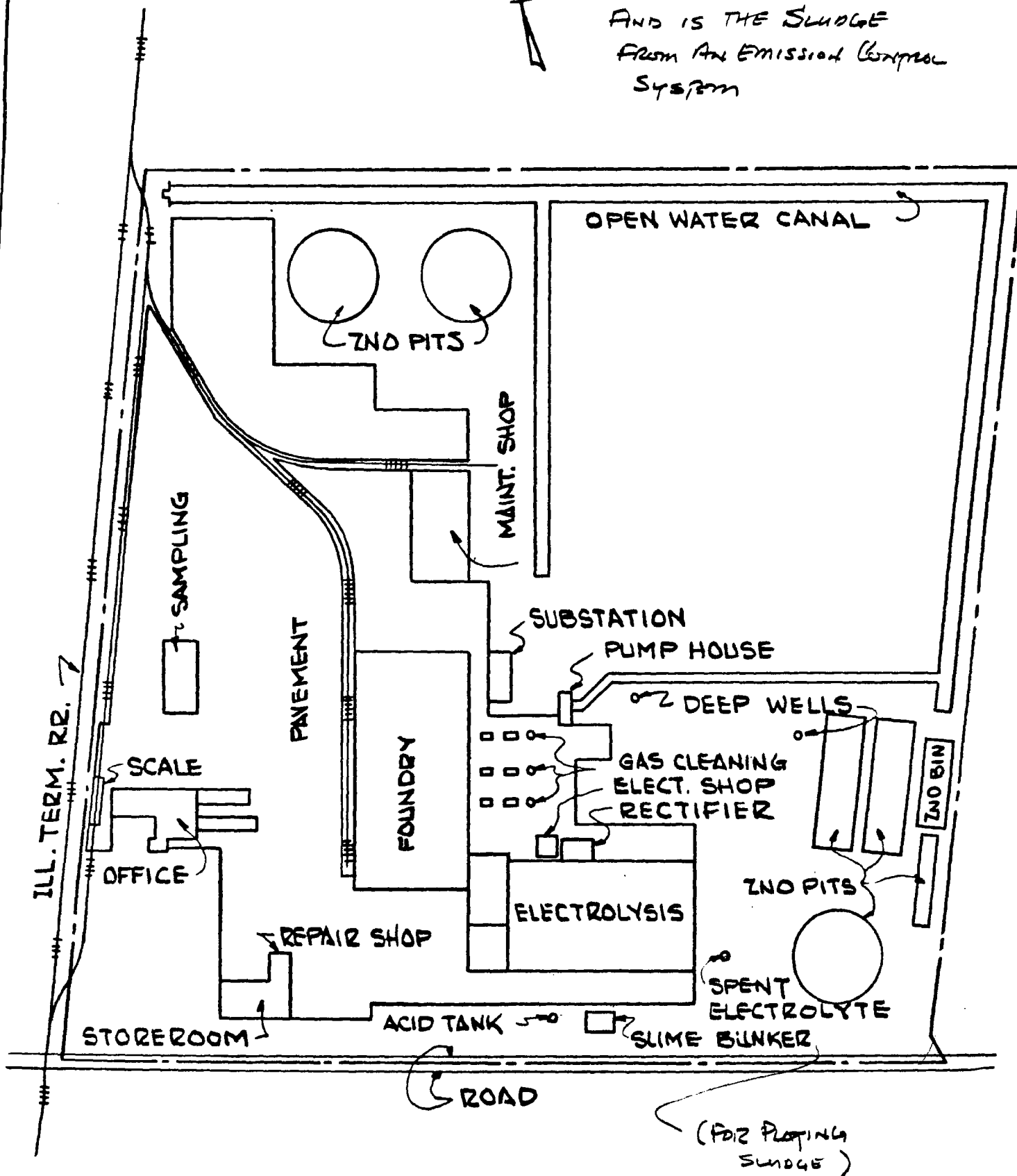
EPA Form 3510-3 (6-80)



## V. FACILITY DRAWING (see page 4)

NOTE:

"ZNO" IS IN CRUDE FORM  
AND IS THE SLUDGE  
FROM AN EMISSION CONTROL  
SYSTEM



PRESENT SITE PLAN

SCALE - 1" = 200'





CHEMETCO  
ROUTE 3 & OLDENBERG ROAD  
HARTFORD, ILLINOIS 62048